Facility Name: **Georgia-Pacific Cedar Springs LLC**
City: Cedar Springs
County: Early
AIRS #: 04-13-099-00001

Application #: TV-45956
Date Application Received: July 5, 2017
Permit No: 2631-099-0001-V-04-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name:

   Georgia-Pacific Cedar Springs LLC

2. Parent/Holding Company Name

   Georgia-Pacific Containerboard LLC

3. Previous and/or Other Name(s)

   Great Southern Paper Company
   Georgia-Pacific Corporation, Cedar Springs Operation

4. Facility Location

   Georgia Highway 273 West
   Cedar Springs, Georgia 39832

5. Attainment, Non-attainment Area Location, or Contributing Area

   The facility is located in an attainment area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
2631-099-0001-V-03-0	January 8, 2013	Title V Renewal Permit
Off-Permit Change	January 29, 2013	Off permit change to replace the 50% Black Liquor Solids Tank
Off-Permit Change	March 11, 2013	Off permit change to make improvements to the Lime Mud Dryer System on the No. 2 Lime Kiln.

Off-Permit Change	March 22, 2013	Off permit change to upgrade the Pulp Mill Seal Water Supply System and Repair the 1C, 5th and 6th Effects and Surface Condensers of No. 2 Evaporator Set.
Off-Permit Change	March 22, 2013	Off permit change to replace Chip Screen Drums of No. 2 Chip Screen System.
2631-099-0001-V-03-1	June 13, 2013	502(b)10 permit modification for the replacement of existing No. 2 fuel oil-fired auxiliary burners in No. 1 Recovery Furnace (Source Code R400) with natural gas-fired burners.
Off-Permit Change	July 31, 2013	Off permit change for the No. 1 Power Boiler economizer modifications and hydrograte system reliability improvements.
Off-Permit Change	August 5, 2013	Off permit change to repair the No. 2 WLC, including conversion from a two-compartment operation to a one-compartment operation.
Off-Permit Change	August 7, 2013	Off permit change to install a new No.4 Green Liquor Clarifier to replace the existing No.1 and No.2 Green Liquor Clarifiers and the replacement of the existing dregs removal system.
Off-Permit Change	October 10, 2013	Off permit change to replace the first stage drum and several internal drum components in the No. 1 Base Washer Line due to the deteriorated condition of the washer drum and several internal drum components and replace the main "bull gear" and electric drive on one end of the washer line and the "journal" tube.
Off-Permit Change	January 6, 2014	Off permit change to replace the No. 2 De-Barking Drum (WG10) with a new drum of the same operating capacity as the existing drum.
2631-099-0001-V-03-2	January 14, 2014	Administrative amendment to update Permit Condition 6.1.7.c.vi.(A) to list correct pH value.
Off-Permit Change	February 5, 2014	Off permit change to replace the furnace floor, beams, headers and lower furnace sidewalls in the No. 2 Recovery Furnace and overlay the boilers tubes in the floor section of the No. 2 Recovery Furnace with Inconel 625 to provide added corrosion protection, and repair 75 tubes located in the upper furnace area to correct stress assistance corrosion associated with these tubes.
Off-Permit Change	April 3, 2014	Off permit change to modify the first and second press sections of the No. 1 Paper Machine with a double-felted fabric, or "tandem belt" clothing arrangement.
Off-Permit Change	July 11, 2014	Off permit change to repair the steel shell of the vapor and liquor sections on one of the seven effects (No. 1C effect) that make-up the No.1 Evaporator Set.
Off-Permit Change	September 2, 2014	Off permit change to replace the first stage drum and several internal drum components in the No. 1A Base Washer Line.
Off-Permit Change	September 24, 2017	Off permit change to upgrade the No. 2 Paper Machine Fourdrinier Table.
Off-Permit Change	October 30, 2014	Off permit change to upgrade the No. 2 Paper Machine.
Off-Permit Change	December 12, 2014	Off permit change to upgrade the No. 1 Paper Machine.
Off-Permit Change	December 12, 2014	Off permit change to replace the electrical drive system for the No. 2 Paper Machine.
Off-Permit Change	April 24, 2015	Off permit change to upgrade the No. 1 Paper Machine.

2631-099-0001-V-03-3	September 8, 2015	Title V Minor Modification without Construction for the modification of Permit Condition 3.3.20 and addition of Permit Condition 6.2.59 to specify compliance options allowed under 40 CFR Subpart S for the NCG/SOG Incinerator/Scrubber System (Source ID No. R425).
Off-Permit Change	September 15, 2015	Off permit change to replace the 1st stage of the NSSC washer drum.
2631-099-0001-V-03-4	April 20, 2016	502(b)10 Modification for various upgrades and changes to the Tall Oil Plant
Off-Permit Change	May 18, 2016	Off permit change to upgrade and/or replace a number of pieces of bark handling equipment in the Woodyard operations so that both purchased bark and bark generated onsite can be processed more quickly and with better removal of the "oversized" and "stringer" bark which causes plugging on the bark transfer conveyors and chutes that direct the bark to the two power boilers.
Off-Permit Change	June 15, 2016	Off permit change to allow approval for the facility's approach for apportioning natural gas usage between the Package Boilers No. 5 (U506) and 6 (U507) per 40 CFR 60, Subpart Dc fuel usage recordkeeping requirements.
Off-Permit Change	June 20, 2016	Off permit change to replace portions of the lime mud dryer that was installed on the No. 2 Lime Kiln.
Off-Permit Change	August 12, 2016	Off permit change for the 3rd stage No. 2 Base Washer Line washer drum replacement.
Off-Permit Change	September 2016	Off permit change to modify the No. 1 and No. 2 Paper Machines.
Off-Permit Change	January 17, 2017	Off permit change to use additional soap from off-site sources in the production of tall oil.
Off-Permit Change	May 16, 2017	Off permit change to install air cannons on the Nos. 1 and 2 Paper Machines which will result in less machine downtime and increase linerboard production. In addition, to replace electrical starters for the stock production area and automate roll labeling, and install pneumatic solenoids and transmitters on the Fourdrinier and press section rolls, all of which will take place on the No. 2 Paper Machine.
Off Permit Change	November 5, 2018	Off permit change to temporarily use the No. 1 Green Liquor Clarifier (L603) as a green liquor storage tank to facilitate startup activities at the Mill after the effects of Hurricane Michael.
Off Permit Change	December 13, 2018	Off permit change to extend temporarily use the No. 1 Green Liquor Clarifier (L603) as a green liquor storage tank to facilitate startup activities at the Mill after the effects of Hurricane Michael.
Off Permit Change	February 8, 2019	Off permit change to install a Turpentine Sump exhaust vent.

D. Process Description

1. SIC Codes(s)

2631

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

Georgia-Pacific Cedar Springs LLC manufactures unbleached Kraft linerboard and unbleached corrugating medium.

3. Overall Facility Process Description

The facility description below has been updated as requested in Title V Application Number 45956. The updated description is included Section 1.3 of the Title V permit.

Woodyard
Logs and purchased chips are received in the woodyard via truck or railcar and are segregated between softwood and hardwood. The logs can be unloaded to one of four circular crane stacks or immediately routed to one of two debarking drums. Logs can also be unloaded and stored temporarily at the wet deck, where stacked logs are watered to prevent drying and associated decay. The logs proceed through the debarking drums where dirt and bark are removed. From the debarking drums, the logs proceed to the chipper. The chips are belt conveyed from the chipper to chip screens for sorting. The acceptable chips are routed, via belt conveyors, to stacker/reclaimers and onto chip storage piles. The oversized chips from the chip screens are sent to a rechipper and are then air conveyed back to the chip screens. Fines from the chip screens and bark from the debarker are concurrently conveyed via belt conveyors to the bark pile to be used for fuel in the power boilers. Wood chips may also be conveyed to the bark pile for use as power boiler fuel. Chips may also be sent to other mills rather than used onsite.

Purchased chips, received separately from logs, are conveyed from truck unloading stations directly to the stacker/reclaimers and placed onto chip piles. Purchased bark and wood residuals are also received by trucks and conveyed to the bark pile via belt conveyors, either directly or after processing through the hog, a piece of wood processing equipment that reduces the size of incoming material to uniformly-sized chips. The Mill also receives chips, bark and wood residuals in live bottom trailers (trailers with conveyor belts to move material out of the trailer without it being raised), which are unloaded directly to chip and bark piles, or to staging areas near the piles and moved to the piles with a front end loader.

Kraft Pulp Mill

Softwood chips (generally pine) are routed from the softwood chip storage area to the Kraft pulping process. The Kraft process begins with the charging of chips into one or more of the twelve batch digesters. White liquor (a solution of sodium hydroxide and sodium sulfide) and residual weak black liquor are added to the digesters, along with steam to "cook" the wood chips. After cooking in the digesters, the contents are blown to digester blow tanks and then routed to a series of refiners and screens to remove oversized particles and to thicken the brownstock mixture. The pulp is washed in brownstock washers to recover residual weak black liquor. The weak black liquor exiting the washers is collected in filtrate tanks, while the washed pulp is pumped to high density storage chests.

Turpentine is a principal byproduct of the Kraft pulping process, and is recovered through a sequence of condensing and decanting. The recovered turpentine is stored prior to loading in rail cars or trucks for shipment to customers. Non-condensable gases (NCGs) are collected from the pulping process, primarily from the digesters, blow tanks, and turpentine recovery system, to reduce odorous emissions and comply with the Pulp and Paper Maximum Achievable Control Technology (MACT) rule (also referred to as the Cluster Rule) and State of Georgia regulations.

Neutral Sulfite Semi-Chemical Pulping

The NSSC pulping process begins with the routing of hardwood chips from the hardwood chip storage area to the hardwood chip silo. Chips from the hardwood chip silo are charged into the NSSC chip surge bin. The chips, sodium sulfite solution (pink liquor), and green liquor from the recovery area are added to the single, 4-tube, continuous digester along with steam to "cook" the wood chips. After cooking, the chips from the digester are mechanically treated through the blow line refiner and discharged to the NSSC digester blow tank. The pulp is routed through another refiner to mechanically treat the pulp and then washed in the brownstock washers to recover residual weak black liquor. The weak black liquor exiting the washers is collected in filtrate tanks, while the washed pulp is pumped to high density storage.

Recycled Fiber Plant

The Cedar Springs Mill operates a Recycled Fiber Plant where bales of OCC (old corrated containers) and DLK (double-lined Kraft) clippings are received, mixed with paper machine white water, and pulped by mechanical agitation. The recycled fiber produced by the pulper is screened, cleaned of contaminants, thickened, and used primarily used as a supplement in the production of corrugating medium on the No. 3 Paper Machine. The Mill also operates a DLK pulper located in the basement of the NO. 3 Paper Machine. DLK bales are slurried with water, pulped by mechanical agitation, cleaned and refined prior to being fed to the paper machines.

Chemical Recovery

Residual weak black liquor is recovered from cooked pulp in the Kraft and NSSC brownstock washing areas and is then routed through the Kraft/NSSC black liquor filter and into liquor collection tanks. At this stage, the weak black liquor is typically between 13% and 14% solids. From the liquor collection tanks, the weak black liquor is routed through a pre-evaporator then to two multiple-effect evaporator sets to increase the solids content of the liquor to approximately 50%. The multiple-effect evaporator sets are a series of evaporators that utilize steam and vacuum pressure to increase the solids content of the black liquor. Black liquor exiting the evaporators is routed to 50% black liquor storage tanks before it is routed through a series of processing steps and then ultimately fired in one of three recovery furnaces.

The black liquor which supplies the No. 3 Recovery Furnace is routed from 50% black liquor storage to concentrators to further increase the solids content to approximately 64% to 68% (heavy black liquor). Heavy black liquor exiting the concentrators is stored in 65% black liquor storage tanks.

From the 50% black liquor storage tanks, the black liquor which supplies the No. 1 and No. 2 Recovery Furnaces is routed to concentrators and to a dedicated set of crystallizers. The crystallizers increase the solids content of the heavy black liquor to 70% to 75%, which is then fed to the No. 1 and No. 2 Recovery Furnaces from a flash tank. The heavy black liquor can be also be blended into the 65% black liquor tanks that feed into the No. 3 Recovery Furnace.

Natural gas and fuel oil can be used to supplement the heat in the recovery furnaces. The No. 1 Recovery Furnace is equipped to fire natural gas. The No. 2 Recovery Furnace is equipped to fire No. 2 fuel oil. The No. 3 Recovery Furnace is equipped to fire No. 2 or No. 6 fuel oil.

In the recovery furnaces, the organic material present in the liquor is oxidized as the carbon is burned away and the inorganic compounds are smelted in reduction reactions. The molten inorganic chemicals, or smelt, consisting primarily of sodium carbonate (Na2CO3), collect in the bottom of the recovery furnace, and pour out of spouts into the associated smelt dissolving tanks. Salt cake, reclaimed from the economizer and the electrostatic precipitator (operated to control emissions of particulate matter), is mixed with black liquor and recycled back into the liquor system via black liquor/salt cake mix tanks and the precipitator mix tanks. The salt cake/black liquor mixture is either directly routed to the recovery furnace or sent back to one of the concentrators for further processing.

In the smelt dissolving tanks, smelt from the recovery furnaces is dissolved in weak wash from the recausticizing area and fresh water to form green liquor. Scrubbers on the smelt dissolving tank vents, using weak wash and/or fresh water as a scrubbing liquid, control the emissions of particulate matter and reduced sulfur compounds.

The chemical recovery operation also can also be supplemented by processing liquor from other mills and using various other makeup chemicals. Black liquor from pulping operations at another facility can be received and processed in combination and concurrently with the Mill's black liquor. "Liquor swaps" can also occur when another facility's black liquor is processed in exchange for the resulting green liquor, which can then be shipped back to the other facility or remain onsite. Additionally, salt cake can be added directly to the process. Lime, caustic soda, brine solutions, and sodium hydrosulfide are other chemicals received at the mill for chemical makeup – to make up for the losses of sodium, sulfur, and other constituents of the pulping process.

Steam, a byproduct of the recovery furnaces, is directed to the steam header that supplies steam to the Mill. Soap is another byproduct of the chemical recovery operation. Soap is skimmed at the evaporators and from liquor tanks and sent to the tall oil plant, where the soap is acidified, and the resulting oil is removed through centrifugal separation and decanting. Soap may also be brought in from other facilities for processing. Tall oil is stored and shipped to customers via truck and rail.

Recausticizing Area

Green liquor exiting the smelt dissolving tanks is routed to two stabilization tanks and a piping header for distribution into the green liquor clarifiers. In the clarifiers, dregs (settleable solids) are removed from the liquor. The clarified green liquor is then routed to storage tanks, while the dregs are filtered/washed and sent to the landfill. Filtrate from the dregs wash/filter operation is recycled to the green liquor stabilization tank.

Green liquor from the green liquor storage tanks and lime [calcium oxide (CaO)] from the lime silos are fed to the slakers. The green liquor/lime mixture is agitated, heat is produced from the exothermic reaction, and slaked lime [calcium hydroxide (CaOH)] is produced. The unreacted solids (grit) are removed in the slaker classifiers and sent to the grits washer. After slaking, the mixture is then routed to the causticizers, where the slaked lime reacts with the sodium carbonate in the green liquor to form sodium hydroxide (and calcium carbonate, a solid), to produce white liquor. The white liquor also includes the sodium sulfide which is carried through the recovery and recausticizing operations in the various liquors.

White liquor exiting the causticizers is routed to the white liquor splitter box for distribution into the white liquor clarifiers, where the white liquor is clarified to remove lime mud (primarily calcium carbonate). The clarified white liquor is then routed to white liquor storage tanks, where it is held prior to its introduction again into the digesters for the pulping operation.

The lime mud is washed, stored and filtered prior to introduction into one of two lime kilns. Weak wash from the mud washers is recycled to the weak wash storage tanks for reuse in the system and for use as scrubbing liquid in the smelt dissolving tank scrubbers. The lime kilns fire natural gas and No. 6 fuel oil to heat the lime mud to first dry it and then drive off carbon dioxide from the calcium carbonate to make lime. The lime exiting the kilns is transported to one of two lime storage silos. The lime kilns are also utilized as a backup to the Incinerator to thermally oxidize NCGs from the pulping and recovery processes. Scrubbers are used on the lime kiln exhausts and the lime storage system to control emissions of particulate matter.

Utilities

The utilities area of the Mill provides air, water, steam and electrical power for the Mill's operation. Raw water, withdrawn from the Chattahoochee River, is treated via screening, flocculation, and filtration prior to its use as process water and cooling water. There are three boilers at the facility which have the primary purpose of providing steam for process operations and generating electrical power for internal mill use.

The No. 1 and No. 2 Power Boilers are permitted to be fired with a combination of wood residuals/bark, coal, tire derived fuel (TDF), natural gas, used oil, No. 2 fuel oil, No. 6 fuel oil, agricultural-derived fuel (ADF) (generally peanut/pecan hulls or whole peanuts/pecans), residuals from the Mill's primary clarifier, mill waste paper, and rejects from the Mill's recycled fiber plant which processes old corrugated containers (OCC) and double-lined Kraft (DLK) clippings. Emissions of particulate matter and sulfur dioxide from the power boilers are controlled with venturi scrubbers which use a caustic scrubbing liquid.

The Mill receives coal via rail and truck. Coal is unloaded and stored in coal piles prior to use in the No. 1 and No. 2 Power Boilers. Fuel oil is received by truck.

The No. 5 Package Boiler is fired with natural gas. The package boiler is used to provide additional process steam when needed. Steam generated from the power and recovery boilers serves the two steam turbine electric generators, the digesters, the evaporators, the machine dryers, and other process operations of the Mill.

Paper Machine Area

The Cedar Springs Mill operates three paper machines that manufacture linerboard (liner) and corrugating medium (medium), as well as bag paper and roll pulp. The No. 1 and No. 2 Paper Machines typically produce linerboard from pulp manufactured using the Kraft pulping process. Stock from the high density storage chests is routed through a series of chests, screens, and refiners where the stock is diluted, mixed, screened, and refined to a uniform consistency. The stock mixture is pumped to the machine chest, the stuff box, and then into the machine head box. Chemicals are added during these steps to control retention, size, pH, and other properties. At each machine, the stock mixture is continuously spread onto a fabric running over a wire support, and the resulting wet sheet is pressed and dried. The dried sheet is then further processed, cut and finished in the winding area prior to storage and shipment from the Mill by truck and rail. While typically in linerboard production service, the No. 2 Paper Machine can also produce medium from NSSC pulp. Reject finished paper (typically referred to as "broke") is returned to the process to be blended with incoming stock.

The No. 3 Paper Machine typically produces medium from pulp manufactured using the NSSC pulping process. In this process, stock from the NSSC high density storage chest is routed to the unrefined chest where it is diluted to a certain consistency. Stock is then pumped through the refiners and screens and into the machine chest where the stock is mixed and refined to achieve a uniform consistency. As with the No. 1 and No. 2 Paper Machines, broke can be recycled by blending with incoming stock.

Additionally, stock from the recycled fiber plant and DLK processing is introduced into the system at the machine chest. The stock mixture exiting the machine chest is routed to the stuff box and then into the machine head box. During these steps the stock mixture is diluted. As with the linerboard machines, the stock mixture is continuously spread on a wire support, and the resulting wet sheet is pressed and dried. The dried sheet is then further processed and finished on the winder prior to shipment by truck and rail.

As noted previously, the Mill processes include a recycled fiber plant where bales of OCC and DLK are received by the Mill and pulped by mechanical agitation. In addition, DLK can be processed separately from OCC and the recycled fiber plant. The resulting pulp is cleaned via screens and used principally to supply part of the stock for the No. 3 Paper Machine.

Control of LVHC and HVLC Gases and Pulping Condensates

In the Kraft and NSSC pulp manufacturing processes, NCGs (Non-Condensable Gases) are generated containing reduced sulfur compounds and various other organic compounds. The NCGs are collected in the low volume, high concentration (LVHC) system. Collection sources are from the two batch digester accumulators in the pulp mill area, NSSC blow heat condenser, turpentine island, pre-evaporator, evaporators, concentrators, and crystallizers. The NCGs from these sources are combined and combusted in either the incinerator or the lime kilns.

Foul process condensates requiring control under NESHAP Subpart S (the "Cluster Rule"), selected contaminated condensates, and condensates from low point drains in the NCG system are combined and treated in a steam stripper. The overhead gases from the stripper, referred to as stripper off-gases (SOGs) are burned in the incinerator. Gases from the incinerator are scrubbed prior to exhausting to the atmosphere. Steam is a byproduct of the incineration process by the use of an indirect contact waste-heat boiler and is used to supplement process steam.

HAP emissions from high volume, low concentration (HVLC) sources are controlled by the Mill's Clean Condensate Alternative (CCA), which provides for reduction in emissions from the smelt dissolving tanks, the Kraft process brownstock washers and the related foam tanks in an amount greater than would be achieved via direct controls on the HVLC sources. Emissions from these sources have been reduced through process changes (directing NSSC condensates to the stripper feed tank and contaminated condensates to the stripper feed tank or the No. 1 Hot Water Storage Tank), addition of hoods on the Kraft brownstock washers, and vent controls (fog and spray nozzles, condensers on the foam tanks, and low flow hoods on the washers).

Miscellaneous Industrial Activities
The Mill also has miscellaneous process operations that support the manufacturing of pulp and paper. These include a potable water treatment system, a wastewater treatment system, and landfills for disposal of sludge from wastewater treatment, ash from the power boilers, and industrial waste. As is typical for a large industrial facility, the Mill operates small stationary and portable engines (some of which may be temporary and have associated small fuel tanks), has equipment that contains refrigerants, uses parts washers, and stores gasoline, lubricants, and other fuels onsite for use in vehicles and maintenance equipment which are used on the site. The Mill has paved and unpaved roadways. The Mill also conducts other miscellaneous insignificant activities, such as storing chemicals in small drums and totes, blast cleaning and painting of structural components, machining and welding, fire training activities, and operating laboratory hoods.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is a major source under PSD. Per the narrative associated with Title V Permit Amendment Number 2631-099-0001-V-03-4, the facility is subject to the following PSD limits:

- PM emissions from the No. 1 and No. 2 Lime Kilns are limited to 20 pounds per hour each.
- SO_2 emissions from the No. 1 and No. 2 Lime Kilns were limited to 113 pounds per hour each. The limits were subsumed by more stringent PSD avoidance limits.
- PM emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 46.0 pounds per hour each.
- PM emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 0.030 gr/dscf corrected to 8 percent oxygen each.
- SO_2 emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 535 pounds per hour each.
- SO_2 emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 300 ppm corrected to 8 percent oxygen each.
- NO_x emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 154 pounds per hour each.
- NO_x emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 0.2 pounds per MMBtu heat input each.
- CO emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 480 pounds per hour each.
- CO emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 11 pounds per ton of air-dried pulp each.
- TRS emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 4.74 pounds per hour each.

- TRS emissions from the No. 1 and No. 2 Recovery Furnaces are limited to 5 ppm on a dry basis corrected to 8 percent oxygen each.
- Opacity of emissions from the No. 1 and No. 2 Recovery Furnaces are limited to less than 20 percent.
- PM emissions from the No. 3 Recovery Furnace are limited to 49.7 pounds per hour.
- TRS emissions from No. 3 Recovery Furnace are limited to 5 ppm on a dry basis corrected to 8 percent oxygen.
- Fuel oil usage in the No. 3 Recovery Furnace is limited to 5.887 million gallons per consecutive 12-month period.
- PM emissions from the No. 1 and No. 2 Smelt Dissolving Tanks are limited to 7.6 pounds per hour each.
- PM emissions from the No. 1 and No. 2 Smelt Dissolving Tanks are limited to 0.12 pounds per ton of BLS (dry weight) each.
- SO_2 emissions from the No. 1 and No. 2 Smelt Dissolving Tanks are limited to 5.5 pounds per hour each.
- SO_2 emissions from the No. 1 and No. 2 Smelt Dissolving Tanks are limited to 25 ppm on a dry basis corrected to 8 percent oxygen.
- TRS emissions from the No. 1 and No. 2 Smelt Dissolving Tanks are limited to 1.05 pounds per hour each.
- TRS compounds from the No. 1 and No. 2 Smelt Dissolving Tanks are limited to less than 0.0168 pounds per ton of BLS each.

The facility has accepted the following limits to avoid PSD review:

- Combined PM emissions from the No. 1 and No. 2 Power Boilers are limited to 0.07 pounds per MMBtu heat input.
- SO_2 emissions from the No. 1 and No. 2 Power Boilers are limited to 135 pounds per hour each.
- Combined SAM emissions from the No. 1 and No. 2 Power Boilers combined are limited to 25.4 tons per consecutive 12-month period.
- Combined NO_x emissions from the No. 1 and No. 2 Power Boilers combined are limited to 3,506.4 tons per consecutive 12-month period.
- Combined CO emissions from the No. 1 and No. 2 Power Boilers combined are limited to 1,240.9 tons per consecutive 12-month period.
- Combined TDF usage in the No. 1 and No. 2 Power Boilers is limited to 10,000 pounds per hour.
- Combined TDF usage in the No. 1 and No. 2 Power Boilers is limited to 120 tons per day.
- SO_2 emissions from the No. 4 Package Boiler are limited to 39.5 tons per consecutive 12-month period. As part of this Title V Renewal, the No. 4 Package Boiler (U505) will be removed from the permit since, according to Application Number 54956, the No. 4 Boiler has been permanently shut down.
- NO_x emissions from the No. 4 Package Boiler are limited to 39.5 tons per consecutive 12-month period. As part of this Title V Renewal, the No. 4 Package Boiler (U505) will be removed from the permit since, according to Application Number 54956, the No. 4 Boiler has been permanently shut down.

- Fuel burned in the No. 4 Package Boiler is limited to natural gas and distillate oil at 0.05 weight percent sulfur. As part of this Title V Renewal, the No. 4 Package Boiler (U505) will be removed from the permit since, according to Application Number 54956, the No.4 Boiler has been permanently shut down.
- Fuel burned in the No. 5 and No. 6 Package Boilers is limited to natural gas.
- GHG emissions (as CO_2e) from the No. 5 and No. 6 Package Boilers combined are limited to 74,900 tons per consecutive 12-month period.
- Total PM emissions from the No. 1 Lime Kiln are limited to 77.2 tons per consecutive 12-month period.
- PM_{10} emissions from the No. 1 Lime Kiln are limited to 66.5 tons per consecutive 12-month period.
- SO_2 emissions from the No. 1 Lime Kiln are limited to 13.54 pounds per hour.
- NO_x emissions from the No. 1 Lime Kiln are limited to 61.6 tons per consecutive 12-month period.
- CO emissions from the No. 1 Lime Kiln are limited to 25.6 tons per consecutive 12-month period.
- TRS emissions from the No. 1 Lime Kiln are limited to 14.0 tons per consecutive 12-month period.
- Pb emissions from the No. 1 Lime Kiln are limited to 0.17 tons per consecutive 12-month period.
- VOC emissions from the No. 1 Lime Kiln are limited to 3.2 tons per consecutive 12-month period.
- SAM emissions from the No. 1 Lime Kiln are limited to 1.4 tons per consecutive 12-month period.
- Total PM emissions from the No. 2 Lime Kiln are limited to 53.8 tons per consecutive 12-month period.
- PM_{10} emissions from the No. 2 Lime Kiln are limited to 46.9 tons per consecutive 12-month period.
- SO_2 emissions from the No. 2 Lime Kiln are limited to 16.25 pounds per hour.
- NO_x emissions from the No. 2 Lime Kiln are limited to 73.9 tons per consecutive 12-month period.
- CO emissions from the No. 2 Lime Kiln are limited to 30.6 tons per consecutive 12-month period.
- TRS emissions from the No. 2 Lime Kiln are limited to 16.8 tons per consecutive 12-month period.
- Pb emissions from the No. 2 Lime Kiln are limited to 0.2 tons per consecutive 12-month period.
- VOC emissions from the No. 2 Lime Kiln are limited to 3.2 tons per consecutive 12-month period.
- SAM emissions from the No. 2 Lime Kiln are limited to 1.6 tons per consecutive 12-month period.
- Processing of CaO in the No. 1 Lime Kiln is limited to 250 tons per day.
- Processing of CaO in the No. 1 Lime Kiln is limited to 91,250 tons per consecutive 12-month period.
- Processing of CaO in the No. 2 Lime Kiln is limited to 300 tons per day.

- Processing of CaO in the No. 2 Lime Kiln is limited to 109,500 tons per consecutive 12-month period.
- Combined used fuel oil usage in the No. 1 Lime Kiln, No. 2 Lime Kiln, No. 3 Recovery Furnace, No. 2 Power Boiler, and No. 2 Power Boiler is limited to 1,400,000 gallons per consecutive 12-month period.
- The Pb content of used fuel oil is limited to 100 ppm.
- NO_x emissions from the NCG/SOG Incinerator/Scrubber System are limited to 30.3 pounds per hour.
- SO_2 emissions from the NCG/SOG Incinerator/Scrubber System are limited to 9.0 pounds per hour.
- SAM emissions from the NCG/SOG Incinerator/Scrubber System are limited to 4.9 pounds per hour.
- PM_{10} emissions from the NCG/SOG Incinerator/Scrubber System are limited to 7.1 pounds per hour.
- VOC emissions from the NCG/SOG Incinerator/Scrubber System are limited to 9.0 pounds per hour.
- The NCG/SOG Incinerator/Scrubber System is limited to burning natural gas, propane, methanol, NCGs, and SOGs.
- VOC emissions from the No. 2 Paper Machine are limited to 103.0 tons per consecutive 12-month period.
- Pulp processing for the No. 2 Paper Machine is limited to 41,870 air-dried tons per month.
- Pulp processing for the No. 2 Paper Machine is limited to 420,354 air-dried tons per consecutive 12-month period.
- Total PM emissions from the Lime Silos / Elevators equipment group are limited to 11.7 pounds per hour.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM_{10}	✓	✓		
$PM_{2.5}$	✓	✓		
SO_2	✓	✓		
VOC	✓	✓		
NO_x	✓	✓		
CO	✓	✓		
TRS	✓	✓		
H_2S	✓	✓		
Individual HAP	✓	✓		
Total HAPs	✓	✓		

3. MACT Standards

   40 CFR 61 Subpart E – National Emission Standard for Mercury: This regulation is applicable for the firing of wastewater sludge in the Power Boilers.

   40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry: This regulation is applicable to the Kraft and Neutral Sulfite Semi-Chemical Pulping operations.

   40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-Chemical Pulp Mills: This regulation is applicable to the Lime Kilns, Recovery Furnaces, and Smelt Dissolving Tanks.

   40 CFR 63 Subpart DDDDD- National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters: This regulation is applicable to the Power Boilers and Package Boilers.

   40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: This regulation is applicable to several gasoline and diesel fired engines at the facility.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	Y
Program Code 8 – Part 61 NESHAP	Y
Program Code 9 - NSPS	Y
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

Application Number 45956 does not indicate facility wide compliance issues.

D. Permit Conditions

Not Applicable.

III. Regulated Equipment Requirements

A. Equipment List for the Process

As part of this Title V Renewal, the No. 4 Package Boiler (U505) will be removed from the permit since, according to Application Number 45956, the No.4 Boiler has been permanently shut down. Therefore this equipment and all permit conditions associated will be removed and or modified to remove the reference to the No. 4 Package Boiler U505.

3.1 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
U500	No. 1 Power Boiler	40 CFR Part 51 Appendix Y 40 CFR 61 Subpart E 40 CFR 63 Subpart DDDDD 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.1 through 3.2.5, 3.2.19, 3.3.1, 3.3.7, 3.3.8, 3.3.26 through 3.3.28, 3.3.31 through 3.3.36, 3.4.1, 3.4.3 through 3.4.5, 3.4.7, 4.2.1 through 4.2.3, 4.2.12 through 4.2.242 5.2.1 through 5.2.4, 5.2.18, 5.2.19, 5.2.28 through 5.2.36, 6.1.7, 6.2.1 through 6.2.9, 6.2.23, 6.2.24, 6.2.54 through 6.2.69*	C500 S500	Multicyclone Venturi Scrubber with caustic solution as scrubbing media
U501	No. 2 Power Boiler	40 CFR Part 51 Appendix Y 40 CFR 61 Subpart E 40 CFR 63 Subpart DDDDD 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(g)	3.2.1 through 3.2.5, 3.2.19, 3.3.1, 3.3.7, 3.3.8, 3.3.26 through 3.3.28, 3.3.31 through 3.3.36, 3.4.1, 3.4.3 through 3.4.5, 3.4.7, 4.2.1 through 4.2.3, 4.2.12 through 4.2.22, 5.2.1 through 5.2.4, 5.2.18, 5.2.19, 5.2.28 through 5.2.36, 6.1.7, 6.2.1 through 6.2.9, 6.2.23, 6.2.24, 6.2.54 through 6.2.69*	C501 S501	Multicyclone Venturi Scrubber with caustic solution as scrubbing media
U506	No. 5 Package Boiler	40 CFR 63 Subpart DDDDD 40 CFR 60 Subpart Dc 391-3-1-.02(2)(d)	3.2.6, 3.2.7, 3.3.3, 3.3.7, 3.3.26 through 3.3.30, 3.4.6, 5.2.28, 6.1.7, 6.2.10, and 6.2.11, 6.2.54 through 6.2.56*	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
L600	No. 1 Lime Kiln	40 CFR 52.21 40 CFR 63 Subpart S† 40 CFR 63 Subpart MM 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 361-3-1-.02(2)(gg)	3.2.8, 3.2.10, 3.2.11, 3.2.19, 3.3.5, 3.3.6, 3.3.9, 3.3.15 through 3.3.18, 3.3.20, 3.3.25, 3.4.1, 3.4.2, 3.4.7, 3.4.8, 4.2.1 through 4.2.8, 4.2.13, 5.2.1 through 5.2.4, 5.2.7,5.2.10, 5.2.11, 5.2.13, 5.2.18, 5.2.20, 6.1.7, 6.2.12, 6.2.13, 6.2.15, 6.2.16, 6.2.23 through 6.2.35, 6.2.40 through 6.2.42, and 6.2.50 through 6.2.53*	C600	Venturi Scrubber
L601	No. 2 Lime Kiln	40 CFR 52.21 40 CFR 63 Subpart S† 40 CFR 63 Subpart MM 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 361-3-1-.02(2)(gg)	3.2.9, 3.2.12, 3.2.13, 3.2.19, 3.3.5, 3.3.6, 3.3.10, 3.3.15 through 3.3.18, 3.3.20, 3.3.25, 3.4.1, 3.4.2, 3.4.7, 3.4.8, 4.2.1 through 4.2.8, 4.2.13, 5.2.1 through 5.2.4, 5.2.7, 5.2.10, 5.2.11, 5.2.13, 5.2.18, 5.2.20, 6.1.7, 6.2.12, 6.2.14, 6.2.15, 6.2.17, 6.2.23 through 6.2.35, 6.2.40 through 6.2.42, and 6.2.50 through 6.2.53*	C601	Venturi Scrubber
R400	No. 1 Recovery Furnace	40 CFR 52.21 40 CFR 60 Subpart Db 40 CFR 60 Subpart BB 40 CFR 63 Subpart MM 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	3.2.14, 3.2.15, 3.3.2, 3.3.4, 3.3.5, 3.3.11, 3.3.12, 3.4.1, 3.4.2, 4.2.1, 4.2.4 through 4.2.8, 4.2.13, 5.2.1, 5.2.3, 5.2.5, 5.2.8, 5.2.10, 5.2.11, 5.2.18, 5.2.21, , 6.1.7, 6.2.21, 6.2.26, 6.2.28, 6.2.28, 6.2.31, 6.2.47, 6.2.48, and 6.2.50 through 6.2.53*	C400	Dry Bottom Electrostatic Precipitator
R401	No. 2 Recovery Furnace	40 CFR 52.21 40 CFR 60 Subpart Db 40 CFR 60 Subpart BB 40 CFR 63 Subpart MM 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	3.2.14, 3.2.15, 3.3.2, 3.3.4, 3.3.5, 3.3.11, 3.3.12, 3.4.1, 3.4.2, 4.2.1, 4.2.4 through 4.2.8, 4.2.13, 5.2.1, 5.2.3, 5.2.5, 5.2.8, 5.2.10, 5.2.11, 5.2.18, 5.2.21, 6.1.7, 6.2.18 through 6.2.21, 6.2.25, 6.2.26, 6.2.28 through 6.2.31 and 6.2.50 through 6.2.53*	C401	Dry Bottom Electrostatic Precipitator

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
R402	No. 3 Recovery Furnace	40 CFR Part 51 Appendix Y 40 CFR 63 Subpart MM 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	3.2.16, 3.2.17, 3.2.19, 3.3.5, 3.3.13, 3.4.1, 3.4.2, 3.4.7, 4.2.1, 4.2.5, 4.2.6, 4.2.7, 4.2.8, 4.2.13, 5.2.1, 5.2.3, 5.2.4, 5.2.6, 5.2.8, 5.2.10, 5.2.11, 5.2.18, 5.2.21, 6.1.7, 6.2.18, 6.2.21 through 6.2.26, 6.2.28, 6.2.29, 6.2.30, 6.2.31, and 6.2.50 through 6.2.53*	C402	Dry Bottom Electrostatic Precipitator
R404	No. 1 Smelt Dissolving Tank	40 CFR 52.21 40 CFR 60 Subpart BB 40 CFR 63 Subpart S‡ 40 CFR 63 Subpart MM 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(gg)	3.2.18, 3.3.4 through 3.3.6, 3.3.22, 3.3.23, 3.3.25, 3.4.1, 3.4.2, 4.2.1, 4.2.6 through 4.2.9, 4.2.13, 5.2.2, 5.2.9, 5.2.9, 5.2.10, 5.2.11, 5.2.18, 5.2.22, 6.1.7, 6.2.25 through 6.2.31, 6.2.34, 6.2.38 through 6.2.41, 6.2.42, and 6.2.50 through 6.2.53*	C404	Wet Mechanical Scrubber
R405	No. 2 Smelt Dissolving Tank	40 CFR 52.21 40 CFR 60 Subpart BB 40 CFR 63 Subpart S‡ 40 CFR 63 Subpart MM 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(gg)	3.2.18, 3.3.4 through 3.3.6, 3.3.22, 3.3.23, 3.3.25, 3.4.1, 3.4.2, 4.2.1, 4.2.5 through 4.2.9, 4.2.13, 5.2.2, 5.2.9, 5.2.10, 5.2.11, , 5.2.18, 5.2.22, 6.1.7, 6.2.25 through 6.2.31, 6.2.34, 6.2.38 through 6.2.42 and 6.2.50 through 6.2.53*	C405	Wet Mechanical Scrubber
R406	No. 3 Smelt Dissolving Tank	40 CFR 63 Subpart S‡ 40 CFR 63 Subpart MM 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(gg)	3.3.5, 3.3.6, 3.3.14, 3.3.22, 3.3.23, 3.3.25, 3.4.1, 3.4.2, 3.4.9, 4.2.1, 4.2.5, 4.2.6, 4.2.7 through 4.2.9, 4.2.13, 5.2.2, 5.2.7, 5.2.10, 5.2.11, 5.2.18, 5.2.23, 6.1.7, 6.2.25 through 6.2.31, 6.2.34, 6.2.38 through 6.2.42, and 6.2.50 through 6,2,53*	C406	Venturi Scrubber
P101 through P112	No. 1 through 12 Digesters	40 CFR 60 Subpart BB 40 CFR 63 Subpart S† 391-3-1-.02(2)(gg)	3.3.4, 3.3.6, 3.3.15 through 3.3.18, 3.3.24, 3.3.25, 3.4.12, 5.2.13, 6.1.7, 6.2.32 through 6.2.35, and 6.2.40 through 6.2.42*	R425	NCG/SOG Incinerator/Scrubber
EVS1	Multiple-Effect Evaporator System	40 CFR 60 Subpart BB 40 CFR 63 Subpart S† 391-3-1-.02(2)(gg)	3.3.4, 3.3.6, 3.3.15 through 3.3.18, 3.3.24, 3.3.25, 3.4.12, 5.2.13, 6.1.7, 6.2.32 through 6.2.35, and 6.2.40 through 6.2.42*	R425	NCG/SOG Incinerator/Scrubber

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
N900	NCG/SOG System	40 CFR 63 Subpart S†‡	3.3.6, 3.3.16 through 3.3.18, 3.3.24, 3.3.25, 5.2.13, 6.1.7, 6.2.32 through 6.2.35, and 6.2.40 through 6.2.42*	R425	NCG/SOG Incinerator/Scrubber
COND	Process Condensates	40 CFR 63 Subpart S†‡	3.3.6, 3.3.19 through 3.3.24, 3.3.25, 4.2.9, 4.2.10, 5.2.12 through 5.2.14, 5.2.16, 6.1.7, and 6.2.38 through 6.2.42*	R424 R425	Foul Condensate Stripper NCG/SOG Incinerator/Scrubber
R424	Foul Condensate Stripper	40 CFR 60 Subpart BB 40 CFR 63 Subpart S†‡	3.3.4, 3.3.6, 3.3.15 through 3.3.18, 3.3.21, 3.3.24, 3.3.25, 5.2.2, 5.2.12 through 5.2.14, 5.2.16, 6.1.7, 6.2.32 through 6.2.35, and 6.2.38 through 6.2.42*	R425	NCG/SOG Incinerator/Scrubber
R425	NCG/SOG Incinerator/Scrubber (with Waste Heat Boiler)	40 CFR 60 Subpart Dc 40 CFR 63 Subpart S†‡ 391-3-1-.02(2)(b) 391-3-1-.02(2)(d) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(gg)	3.2.20, 3.2.21, 3.3.3, 3.3.6, 3.3.15 through 3.3.18, 3.3.20, 3.3.24, 3.3.25, 3.4.1, 3.4.2, 3.4.6, 3.4.10, 3.4.12, 5.2.2, 5.2.13, 5.2.18, 5.2.24, 5.2.25, 6.1.7, 6.2.10 6.2.32 through 6.2.35, .2.37 through 6.2.42, and 6.2.47*	None	None (The incinerator is a control device. The lime kilns are backup control devices for the incinerator.) Scrubber with caustic solution as scrubber medium.
R426	Foul Condensate Stripper Feed Tank	40 CFR 63 Subpart S†‡	3.3.6, 3.3.16, 3.3.17, 3.3.20, 3.3.21, 3.3.25, 5.2.2, 5.2.12 through 5.2.14, 6.1.7, 6.2.32 through 6.2.35, and 6.2.40 through 6.2.48*	R424 R425	Foul Condensate Stripper NCG/SOG Incinerator/Scrubber
TRS1	Turpentine Recovery System	40 CFR 63 Subpart S†	3.3.6, 3.3.16, 3.3.17, 3.3.18, 3.3.25, 5.2.13, 6.1.7, 6.2.32 through 6.2.35, and 6.2.40 through 6.2.42*	R425	NCG/SOG Incinerator/Scrubber
POG1	**Kraft Pulping and Brownstock Washing**				
P113 P116 P119 P122	No. 1A Base Brownstock Washers (3 stages) No. 1 Base Brownstock Washers (3 stages) No. 2 Base Brownstock Washers (3 stages) No. 2 Top Brownstock Washers (3 stages)	40 CFR 63 Subpart S‡	3.3.6, 3.3.22, 3.3.23, 3.3.25, 4.2.9, 4.2.10, 4.2.11, 5.2.17, 6.1.7, 6.2.34, and 6.2.38 through 6.2.42*	None	None◊ (Low flow hoods for CCA compliance.)
P129 P130 P131	No. 1 Foam Tank No. 2 Foam Tank Black Liquor Filter (Kraft/NSSC)	None	None*	None	None
SOG1	**NSSC Pulping and Washing System**				
S200	NSSC Blow Tank	40 CFR 63 Subpart S†	3.3.6, 3.3.16 through 3.3.18, 3.3.25, 5.2.13, 6.1.7, 6.2.32 through 6.2.35, and 6.2.40 through 6.2.42*	R425	NCG/SOG Incinerator/Scrubber

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
S201	NSSC Brownstock Washers (3 stages)	None	None*	None	None
S204 S205 S206 S207	No. 1 NSSC Filtrate Tank No. 2 NSSC Filtrate Tank No. 3 NSSC Filtrate Tank NSSC Spent Liquor Tank	None	None*	None	None
REG1	**Black Liquor and Associated Black Liquor Process Tanks**				
R407 R408 R409	No. 1 Weak BL Tank No. 2 Weak BL Tank No. 3 Weak BL Tank	None	None*	None	None
R410 R411 R412	No. 1 50% BL Tank No. 2 50% BL Tank No. 3 50% BL Tank	None	None*	None	None
R413	Scavenger Tank	None	None*	None	None
R414 R415	East 65% BL Tank West 65% BL Tank	None	None*	None	None
R416 R417	HPD Island - 65% BL Tank HPD Island - 75% BL Tank	None	None*	None	None
R418 R419 R420	No. 1 Precipitator Mix Tank No. 2 Precipitator Mix Tank No. 3 Precipitator Mix Tank	None	None*	None	None
R421 R422 R423	No. 1 Salt Cake Mix Tank No. 2 Salt Cake Mix Tank No. 3 Salt Cake Mix Tank	None	None*	None	None
R427 R428	No. 4 BL Storage Tank No. 5 BL Storage Tank	None	None*	None	None
MEG1	**Stock Storage Chests**				
M764 M765	Top Tower A Top Tower B	None	None*	None	None
M766 M767	No. 1 Base Tower No. 2 Base Tower	None	None*	None	None
M768	No. 3 High Density Tower	None	None*	None	None
M769 M770 M771	No. 1 Broke Tower No. 2 Broke Tower No. 3 Broke Tower	None	None*	None	None
M772	No. 3 PM Broke Tower #2	None	None*	None	None
M773	Alternate Tower	None	None*	None	None
MOG1	**Paper Machines**				
M701	No. 1 Paper Machine (Kraft)	None	None*	None	None
M702	No. 2 Paper Machine (Kraft)	None	3.2.22 through 3.2.24, 6.1.7, and 6.2.43 through 6.2.45*	None	None
M703	No. 3 Paper Machine (NSSC)	None	None*	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
LEG1	**Slakers**				
L614	No. 1 Slaker	40 CFR 52.21	None*	None	None
L615	No. 2 Slaker	40 CFR 52.21	None*	None	None
LEG2	**Lime Silos / Elevators (Handling / Transfer / Storage)**				
L636 L637	No. 1 Lime Silo / Elevator (storage / handling / transfer) No. 2 Lime Silo / Elevator (storage / handling / transfer)	40 CFR 52.21 40 CFR 64 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.25, 3.4.1, 3.4.2, 5.2.2, 5.2.18, 5.2.26, and 6.1.7*	C636	Venturi Scrubber
LOG1	**Causticizing Equipment**				
L604 L608	No. 2 Green Liquor Stabilization Tank No. 3 Green Liquor Clarifier No. 4 Green Liquor Clarifier	None	None*	None	None
L616	White Liquor Splitter Box	None	None*	None	None
L617 L618 L619	No. 1 White Liquor Clarifier No. 2 White Liquor Clarifier No. 3 White Liquor Clarifier	None	None*	None	None
L624	Lime Mud Washer Splitter Box	None	None*	None	None
L625 L626 L627	No. 1 Lime Mud Washer No. 2 Lime Mud Washer No. 3 Lime Mud Washer	None	None*	None	None
L633 L634	No. 1 Lime Mud Filter Vacuum Pump No. 2 Lime Mud Filter Vacuum Pump	None	None*	None	None
L635	Common Wasting Mud Filter Vacuum Pump	None	None*	None	None
L639 L640	No. 1 Lime Mud Filter No. 2 Lime Mud Filter	None	None*	None	None
L641	Common Wasting Mud Filter	None	None*	None	None
L642 L643	No. 1 Causticizer Line No. 2 Causticizer Line	None	None*	None	None
N/A	**Other**				
T309	Tall Oil Reactor	None	None*	None	None
L613	Grit Washer	None	None*	None	None
WWT1	Wastewater Treatment System	None	None*	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

† Indicates compliance with Phase I of 40 CFR 63 Subpart S.

‡ Indicates compliance with the CCA option of 40 CFR 63 Subpart S.

◊ Additional incoming wash water has been treated using R424/R425 per the CCA.

B. Equipment & Rule Applicability

The following equipment and rule applicability is as provided in the narrative associated with Title V Permit Number 2631-099-0001-V-3-0 unless otherwise specified.

The No. 1 Power Boiler (Source Code U500) was constructed in 1963, is rated at 784 x 10^6Btu/hr, and is equipped with a venturi scrubber (Source Code S500). The No. 2 Power Boiler (Source Code U501) was constructed in 1967, is rated at 784 x 10^6 Btu/hr, and is equipped with a venturi scrubber (Source Code S501). Both units are permitted to burn coal, bark/wood waste, no. 6 fuel oil, no. 2 fuel oil, TDF, peanut/pecan hulls, natural gas, used oil, primary clarifier sludge, recycle plant rejects, and plant paper waste. The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent.
- Georgia Rule 391-3-1-.02(2)(d) – Fuel-Burning Equipment: The boilers were constructed prior to January 1, 1972; therefore, the units are only subject to a PM limit under this rule. Rule (d) limits PM emissions (in terms of lb/MMBtu) from these boilers to $0.7(10/R)^{0.202}$ where R is the heat input in MMBtu/hr.
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: The boilers were constructed prior to January 1, 1972; therefore, the units are only subject to a fuel sulfur content under this rule. Rule (g) limits the sulfur content of fuel burned in the boilers to 3 percent, by weight.
- 40 CFR 51, Appendix Y – Guidelines for BART Determinations Under the Regional Haze Rule: The boilers qualify for BART because they were in existence on August 7, 1977, were not in operation before August 7, 1962, emit greater than 250 tons per year of any pollutant, and are in one of the 26 specifically listed source categories. The facility accepted SO_2 emission limits to complete a BART exemption demonstration.
- 40 CFR 61 Subpart E – National Emission Standard for Mercury: The boilers burn wastewater sludge, which is classified as sludge incineration under the subpart. Each boiler is limited to emissions of 3200 grams of mercury per 24-hour period.
- 40 CFR 64 – Compliance Assurance Monitoring – Please see section V.C. of this narrative.
- 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. The boilers are hybrid suspension grate units which burn wet biomass/bio-based solid fuels. The boilers must comply with applicable emission limits, performance testing, monitoring and recordkeeping. The boilers are each subject to the HCl emission limit of 2.2 x 10^{-2} lb per MMBtu of heat input, the filterable PM emission limit of 0.44 lbs/MMBtu heat input, the mercury emission limit of 5.7 x 10^{-6} lb per MM Btu of heat input, CO emission limit of 900 parts per million by volume dry basis (ppmvd) corrected to three percent oxygen as a 30-dayrolling average. According to Application Number 45956, the existing No. 1 and No. 2 Power Boilers are in compliance with the Boiler MACT rule. According to Application Number 45956, the facility submitted a notification of compliance to the Georgia EPD on September 9, 2016.
- Avoidance of 40 CFR 52.21 – Please see section I.E.1 of this narrative.

The No. 5 Package Boiler (Source Code U506) was constructed in 2009 and is rated at 99.9 x 10^6 Btu/hr. The No. 6 Package Boiler (Source Code U507) was constructed in 2008 and was rated at 54.0 x 10^6 Btu/hr. The No. 6 Package Boiler was removed from the facility on May 31, 2018. Therefore, all permit conditions referencing the No. 6 Package Boiler have been updated to remove it from the permit. The No.5 Package Boiler is permitted to burn natural gas. The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent. The boiler is subject to a more stringent, unit specific opacity limit under Rule (d).
- Georgia Rule 391-3-1-.02(2)(d) – Fuel-Burning Equipment: The boilers were constructed after January 1, 1972; therefore, the units are subject to both opacity and PM limits under the rule. Rule (d) limits PM emissions (in terms of lb/MMBtu) from the boiler to $0.5(10/R)^{0.5}$ where R is the heat input in MMBtu/hr. The opacity from the boiler is limited to 20 percent except for one 6-minute period per hour of not more than 27 percent.
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: The boilers are subject to a fuel sulfur content limit of 2.5 percent, by weight.
- 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: The boilers are subject to the regulations because the boilers were constructed after June 9, 1989 and are rated between 10 and 100 MMBtu/hr. The boilers are not subject to any specific emission limit because they burn only natural gas.
- 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters: These boilers are considered Gas 1 existing units and must comply with applicable emission limits, performance testing, monitoring and recordkeeping. According to Application Number 45956, the facility submitted a notification of compliance to the Georgia EPD on September 9, 2016.
- Avoidance of 40 CFR 52.21 – Please see section I.E.1 of this narrative.

The No. 1 Lime Kiln (Source Code L600) was constructed in 1963 and is equipped with a venturi scrubber (Source Code C600). The No. 2 Lime Kiln (Source Code L601) was constructed in 1967 and is equipped with a micro mist scrubber (Source Code C601). Both kilns are rated at 140 x 10^6Btu/hr and are permitted to burn No. 6 fuel oil, natural gas, and used oil. The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: The rule limits PM from a source based on the process input weight.
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: The kilns are subject to a fuel sulfur content limit of 3 percent, by weight.
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The kilns were constructed prior to September 24, 1976; therefore, they are subject to a TRS limit of 40 ppm on a dry basis corrected to 10 percent oxygen.
- 40 CFR 63 Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry: The facility uses the lime kilns as backup incineration points for vent gases that are subject to Subpart S.

- 40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-Chemical Pulp Mills: The facility has opted to comply with PM limits of the subpart through the bubble compliance alternative allowed under 40 CFR 63.862(a)(1)(ii). The mill qualifies for this compliance alternative because it operates more than 6,300 hours per year and all applicable units are existing sources. The limits for the No. 1 Lime Kiln and No. 2 Lime Kiln are 0.064 gr/dscf corrected to 10 percent oxygen and 0.056 gr/dscf corrected to 10 percent oxygen, respectively. This regulation was recently amended to require electronic submittal of semiannual compliance reports. It reduced the opacity monitoring allowance from 6% to 3% for lime kilns. The amended rule also requires periodic stack testing every five years and electronic submittal of the testing results. The rule removed exemptions for startup, shutdown, and malfunction (SSM). The rule now provides alternative monitoring of scrubber fan amperage instead of pressure drop for certain scrubbers. As part of this permit renewal, the permit has been updated to reflect the amended rule changes.
- 40 CFR 64 – Compliance Assurance Monitoring – Please see section V.C. of this narrative.
- 40 CFR 52.21 BACT – Please see section I.E.1 of this narrative.
- Avoidance of 40 CFR 52.21 – Please see section I.E.1 of this narrative.

The No. 1 Recovery Furnace (Source Code R400) was initially constructed in 1963 and was modified in 1990. The No. 2 Recovery Furnace (Source Code R401) was initially constructed in 1967 and was modified in 1991. Each furnace is permitted to burn no. 2 fuel oil at a rate of 715 MMBtu/hr and can process black liquor solids at 52.8 tons per hour (626×10^6 Btu/hr). Each furnace is equipped with an ESP (Source Codes C400 and C401). The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent. The furnaces are subject to more stringent, unit specific opacity limits under PSD BACT.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: The rule limits PM from a source based on the process input weight.
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: The furnaces are subject to a fuel sulfur content limit of 3 percent, by weight. The limit is subsumed by a more stringent limit under 40 CFR 60 Subpart Db.
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The furnaces were constructed prior to September 24, 1976; therefore, they are subject to a TRS limit of 20 ppm on a dry basis corrected to 8 percent oxygen. This limit is subsumed by more stringent limits under PSD BACT and 40 CFR 60 Subpart BB.
- 40 CFR 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units: The furnaces are subject to the regulations because they were modified after June 19, 1984 and can burn fuel oil in excess of 100 MMBtu/hr. The facility complies with the SO_2 requirements under the subpart by burning low sulfur fuel oil. The fuel oil sulfur limit under Subpart Db (0.5 percent by weight) is more stringent that the Rule (g) limit. The regulation also limits the opacity of emissions to 20 percent except for one 6-minute period per hour of not more than 27 percent. This is more stringent than limits under Rule (b) and 40 CFR 60 Subpart BB, however, it is subsumed by a more stringent limit under PSD BACT. Finally, each furnace is subject to a 10 percent annual capacity factor for oil. This allows the facility to avoid NO_X limits under the subpart.

- 40 CFR 60 Subpart BB – Standards of Performance for Kraft Pulp Mills: The furnaces were modified after September 24, 1976; therefore, they are subject to limits under this subpart. The PM limit is 0.044 gr/dscf corrected to 8% oxygen. The PM limit is subsumed by more stringent requirements under PSD BACT and 40 CFR 63 Subpart MM. The subpart has an opacity limit of 35 percent, which is subsumed by more stringent limits under PSD BACT and 40 CFR 60 Subpart Db. The subpart also has a TRS limit of 5 ppm corrected to 8 percent oxygen. This is equal to the PSD BACT limit for these units.
- 40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-Chemical Pulp Mills: The facility has opted to comply with PM limits of the subpart through the bubble compliance alternative allowed under 40 CFR 63.862(a)(1)(ii). The mill qualifies for this compliance alternative because it operates more than 6,300 hours per year and all applicable units are existing sources. The limit for each furnace is 0.030 gr/dscf corrected to 8 percent oxygen. This limit is the same as the PSD BACT limit and subsumes the limit under 40 CFR 60 Subpart BB.

  This regulation was recently amended to require electronic submittal of semiannual compliance reports. It reduced the opacity monitoring allowance from 6% to 2% for recovery furnaces. The amended rule also requires periodic stack testing every five years and electronic submittal of the testing results. The rule removed exemptions for startup, shutdown, and malfunction (SSM). The rule added a requirement for recovery furnaces equipped with ESP to maintain proper operation of the ESP automatic voltage control (AVC). As part of this permit renewal, the permit has been updated to reflect the amended rule changes.
- 40 CFR 64 – Compliance Assurance Monitoring – Please see section V.C. of this narrative.
- 40 CFR 52.21 BACT – Please see section I.E.1 of this narrative.

The No. 3 Recovery Furnace (Source Code R402) was initially constructed in 1974. The furnace is permitted to burn no. 6 fuel oil blended with used oil at a rate of 1008 x 10^6 Btu/hr and can process black liquor solids at 85 tons per hour (1008 x 10^6 Btu/hr). The furnace is equipped with an ESP (Source Code C402). The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: The rule limits PM from a source based the process input weight.
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: The furnace is subject to a fuel sulfur content limit of 3 percent, by weight.
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The furnace was constructed prior to September 24, 1976; therefore, it is subject to a TRS limit of 20 ppm on a dry basis corrected to 8 percent oxygen. This limit is subsumed by a more stringent limit under PSD BACT.
- 40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-Chemical Pulp Mills: The facility has opted to comply with PM limits of the subpart through the bubble compliance alternative allowed under 40 CFR 63.862(a)(1)(ii). The mill qualifies for this compliance alternative because it operates more than 6,300 hours per year and all applicable units are existing sources. The limit for the furnace is 0.024 gr/dscf corrected to 8 percent oxygen.

This regulation was recently amended to require electronic submittal of semiannual compliance reports. It reduced the opacity monitoring allowance from 6% to 2% for recovery furnaces. The amended rule also requires periodic stack testing every five years and electronic submittal of the testing results. The rule removed exemptions for startup, shutdown, and malfunction (SSM). The rule added a requirement for recovery furnaces equipped with ESP to maintain proper operation of the ESP automatic voltage control (AVC). As part of this permit renewal, the permit has been updated to reflect the amended rule changes.

- 40 CFR 64 – Compliance Assurance Monitoring – Please see section V.C. of this narrative.
- 40 CFR 52.21 BACT – Please see section I.E.1 of this narrative.
- Avoidance of 40 CFR 52.21 – Please see section I.E.1 of this narrative.

The No. 1 Smelt Dissolving Tank (Source Code R404) was initially constructed in 1963 and was modified in 1990. The No. 2 Smelt Dissolving Tank (Source Code R405) was initially constructed in 1967 and was modified in 1991. Each tank is equipped with a wet scrubber (Source Codes C404 and C405). The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: The rule limits PM from a source based on the process input weight.
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The tanks were constructed prior to September 24, 1976; therefore, they are subject to a TRS limit of 0.0168 pounds per ton of dry liquor solids. This is the same as the limit issued under PSD BACT.
- 40 CFR 60 Subpart BB – Standards of Performance for Kraft Pulp Mills: The tanks were modified after September 24, 1976; therefore, they are subject to limits under this subpart. The PM limit is 0.20 pounds per ton of dry liquor solids. The PM limit is subsumed by more stringent requirements under PSD BACT and 40 CFR 63 Subpart MM. The subpart also has a TRS limit of 0.033 pounds per ton as H_2S. This is subsumed by limits under PSD BACT and Rule (gg).
- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): The facility has elected to comply with Phase II of the Cluster Rule through the Clean Condensate Alternative. The Clean Condensate Alternative plan involves achieving HAP reductions from the Brownstock Washers and the Smelt Dissolving Tanks that are equivalent to the HAP reductions that would been achieved had "straight-forward" compliance been required for the HVLC sources listed under 40 CFR 63.443. The permit limit has been established as a reduction of 0.63 pounds of HAP per ODTP.
- 40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-Chemical Pulp Mills: The facility has opted to comply with PM limits of the subpart through the bubble compliance alternative allowed under 40 CFR 63.862(a)(1)(ii). The mill qualifies for this compliance alternative because it operates more than 6,300 hours per year and all applicable units are existing sources. The limit for each tank is 0.12 pounds per ton of black liquor solids. The limit subsumed the limit under 40 CFR 60 Subpart BB and is the same as the PSD BACT limit.

This regulation was recently amended to require electronic submittal of semiannual compliance reports. The amended rule also requires periodic stack testing every five years and electronic submittal of the testing results. The rule removed exemptions for startup, shutdown, and malfunction (SSM). The rule now provides alternative monitoring of scrubber fan amperage instead of pressure drop for certain scrubbers. As part of this permit renewal, the permit has been updated to reflect the amended rule changes.

- 40 CFR 64 – Compliance Assurance Monitoring – Please see section V.C. of this narrative.
- 40 CFR 52.21 BACT – Please see section I.E.1 of this narrative.

The No. 3 Smelt Dissolving Tank (Source Code R406) was initially constructed in 1972. The tank is equipped with a wet scrubber (Source Codes C406). The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: The rule limits PM from a source based on the process input weight.
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: The tank was constructed prior to September 24, 1976; therefore, it is subject to a TRS limit of 0.0168 pounds per ton of dry liquor solids.
- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): The facility has elected to comply with Phase II of the Cluster Rule through the Clean Condensate Alternative. The Clean Condensate Alternative plan involves achieving HAP reductions from the Brownstock Washers and the Smelt Dissolving Tanks that are equivalent to the HAP reductions that would been achieved had "straight-forward" compliance been required for the HVLC sources listed under 40 CFR 63.443. The permit limit has been established as 0.63 pounds of HAP per ODTP.
- 40 CFR 63 Subpart MM – National Emission Standard for Hazardous Air Pollutants for Chemical Recovery Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-Chemical Pulp Mills: The facility has opted to comply with PM limits of the subpart through the bubble compliance alternative allowed under 40 CFR 63.862(a)(1)(ii). The mill qualifies for this compliance alternative because it operates more than 6,300 hours per year and all applicable units are existing sources. The limit for the tank is 0.53 pounds per ton of black liquor solids.

  This regulation was recently amended to require electronic submittal of semiannual compliance reports. The amended rule also requires periodic stack testing every five years and electronic submittal of the testing results. The rule removed exemptions for startup, shutdown, and malfunction (SSM). The rule now provides alternative monitoring of scrubber fan amperage instead of pressure drop for certain scrubbers. As part of this permit renewal, the permit has been updated to reflect the amended rule changes.
- 40 CFR 64 – Compliance Assurance Monitoring – Please see section V.C. of this narrative.

The Digesters (Source Codes P101 through P112) and the Multiple-Effect Evaporator System (Source Code EVS1) have been constructed/modified on various dates. The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: Portions of the plant were constructed prior to September 24, 1976; therefore, the equipment is subject to TRS requirements under this rule. The equipment is not subject to an emission limit provided TRS gases are combusted in a lime kiln or recovery furnace subject to the rule or are incinerated in another device at 1200 degrees Fahrenheit for at least 0.5 seconds. The facility complies through the use of the NCG/SOG Incinerator. The facility uses the No. 1 and No. 2 Lime Kilns as backup control devices.
- 40 CFR 60 Subpart BB – Standards of Performance for Kraft Pulp Mills: Portions of the plant were constructed or modified September 24, 1976; therefore, the equipment is subject to TRS requirements under this subpart. The equipment is not subject to an emission limit provided TRS gases are combusted in a lime kiln or recovery furnace subject to the subpart or is incinerated in another device at 1200 degrees Fahrenheit for at least 0.5 seconds. The facility complies with the second option through the use of the NCG/SOG Incinerator. The facility uses the No. 1 and No. 2 Lime Kilns as backup control devices. These devices also comply with the second option.
- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): The subpart requires the facility to control emission vents from this equipment by directing the gases to the incineration device or by introducing the emissions into the flame zone of the a combustion device. The facility complies through the use of the NCG/SOG Incinerator/Scrubber system. The facility uses the No. 1 and No. 2 Lime Kilns as backup control devices. These provisions are commonly known as Phase I of the Cluster Rule.

The NCG/SOG System (Source Code N900) is where the TRS gases from various units are centrally combined for combustion in the NCG/SOG Incinerator or No. 1 and No. 2 Lime Kilns. The applicable regulation is summarized below.

- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): The subpart requires the facility to control emission vents from the LVHC System by directing the gases to the incineration device or by introducing the emissions into the flame zone of the combustion device. The facility complies through the use of the NCG/SOG Incinerator/Scrubber system. The facility uses the No. 1 and No. 2 Lime Kilns as backup control devices. These provisions are commonly known as Phase I of the Cluster Rule.

  The facility had elected to comply with Phase II of the Cluster Rule through the Clean Condensate Alternative. However, per Permit No. 2631-099-0001-V-03-3, the permit was modified to include all compliance options for this equipment. The NCG/SOG System collects gases that result from the collection and treatment of additional condensate streams.

The Process Condensates (Source Code COND) is the group of liquid HAP-containing streams that are collected and treated at the mill. The applicable regulation is summarized below.

- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): Phase 1 of the Cluster Rule requires the facility to collect a HAP mass of at least 7.2 pounds per ton of ODP from process condensates and to treat the condensate stream to remove at least 6.6 pounds of HAP per ton of ODP. The facility has selected the Pre-evaporator Foul Condensate and Turpentine System Condensate streams to achieve these reductions. The facility complies by sending the streams to the Foul Condensate Stripper.

The source code also includes the condensate streams related to the Clean Condensate Alternative (Pre-evaporator Contaminated Condensate Stream and the NSSC Foul Condensate Stream). The facility directs these streams to the Foul Condensate Stripper to achieve the reductions required by Phase II of the Cluster Rule (0.63 pounds of HAP per ODTP).

The Foul Condensate Stripper (Source Code R424) was installed in 2000 and vents to the NCG/SOG Incinerator/Scrubber System. The applicable rules and regulations are summarized below.

- 40 CFR 60 Subpart BB – Standards of Performance for Kraft Pulp Mills: Portions of the plant were constructed or modified September 24, 1976; therefore, the equipment is subject to TRS limits under this subpart. The equipment is not subject to an emission limit provided TRS gases are combusted in a lime kiln or recovery furnace subject to the subpart or is incinerated in another device at 1200 degrees Fahrenheit for at least 0.5 seconds. The facility complies with the second option through the use of the NCG/SOG Incinerator. The facility uses the No. 1 and No. 2 Lime Kilns as backup control devices. These devices also comply with the second option.
- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): The Foul Condensate Stripper is used to meet the HAP treatment requirement of least 6.6 pounds of HAP per ton of ODP under Phase I of the Cluster Rule. The unit is also used to treat condensates to meet the requirements of the Clean Condensate Alternative (0.63 pounds of HAP per ODTP).

The NCG/SOG Incinerator/Scrubber System (Source Code R425) was installed in 2000. The Incinerator can burn natural gas and is rated at 20 x 10^6 Btu/hr. The incinerator is equipped with a waste heat boiler that can recover heat and product steam. The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent.
- Georgia Rule 391-3-1-.02(2)(d) – Fuel-Burning Equipment: The waste heat boiler was constructed after January 1, 1972; therefore, the unit is subject to both opacity and PM limits under the rule. Rule (d) limits PM emissions (in terms of lb/MMBtu) from the boiler to $0.5(10/R)^{0.5}$ where R is the heat input in MMBtu/hr. The opacity from the boiler is limited to 20 percent except for one 6-minute period per hour of not more than 27 percent.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: The rule limits PM from a source based the process input weight.
- Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide: The waste heat boiler is subject to a fuel sulfur content limit of 2.5 percent, by weight.
- Georgia Rule 391-3-1-.02(2)(gg) – Kraft Pulp Mills: Portions of the plant were constructed prior to September 24, 1976; therefore, the equipment is subject to TRS requirements under this rule. The equipment is not subject to an emission limit provided TRS gases are combusted in a lime kiln or recovery furnace subject to the rule or are incinerated in another device at 1200 degrees Fahrenheit for at least 0.5 seconds. The facility complies through the use of the NCG/SOG Incinerator. The facility uses the No. 1 and No. 2 Lime Kilns as backup control devices.
- 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: The waste heat boiler is subject to the regulation because the boiler was constructed after June 9, 1989 and is rated between 10 and 100 x 10^6 Btu/hr.

The boiler is not subject to any specific emission limit because the incinerator burns only natural gas.

- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): The subpart requires the facility to control emission vents from the LVHC System by directing the gases to the incineration device or by introducing the emissions into the flame zone of the a combustion device. The facility complies through the use of the NCG/SOG Incinerator/Scrubber System. The facility uses the No. 1 and No. 2 Lime Kilns as backup control devices. The Incinerator/Scrubber System also burns the overhead gases from the Foul Condensate Stripper, which handles Phase I condensate streams and the Clean Condensate Alternative condensate streams.
- Avoidance of 40 CFR 52.21 – Please see section I.E.1 of this narrative.

The Foul Condensate Stripper Feed Tank (Source Code R426) has a capacity of 96,000 gallons and was installed in 2000. The applicable regulation is summarized below.

- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): Phase 1 of the Cluster Rule requires the facility to collect a HAP mass of at least 7.2 pounds per ton of ODP from process condensates and to treat the condensate stream to remove at least 6.6 pounds of HAP per ton of ODP. The facility has selected the Pre-evaporator Foul Condensate and Turpentine System Condensate streams to achieve these reductions. The facility complies by sending the streams to the Foul Condensate Stripper.

  The source code also includes the condensate streams related to the Clean Condensate Alternative (Pre-evaporator Contaminated Condensate Stream and the NSSC Foul Condensate Stream). The facility directs these streams to the Foul Condensate Stripper to achieve the reductions required by Phase II of the Cluster Rule (0.63 pounds of HAP per ODTP).

The applicable regulation for the Turpentine Recovery System (Source Code TRS1) and the NSSC Blow Tank (Source Code S200) is summarized below.

- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): The subpart requires the facility to control emission vents from this equipment by directing the gases to the incineration device or by introducing the emissions into the flame zone of the combustion device. The facility complies through the use of the NCG/SOG Incinerator/Scrubber system. The facility uses the No. 1 and No. 2 Lime Kilns as backup control devices.

The applicable regulation for the No. 1A Base Brownstock Washers (Source Code P113), No. 1 Base Brownstock Washers (Source Code P116), No. 2 Base Brownstock Washers (Source Code P119), and No. 2 Top Brownstock Washers (Source Code P122) is summarized below.

- 40 CFR 63 Subpart S – National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry (Cluster Rule): The facility has elected to comply with Phase II of the Cluster Rule through the Clean Condensate Alternative. The Clean Condensate Alternative plan involves achieving HAP reductions from the Brownstock Washers and the Smelt Dissolving Tanks that are equivalent to the HAP reductions that would been achieved had "straight-forward" compliance been required for the HVLC sources listed under 40 CFR 63.443. The permit limit has been established as 0.63 pounds of HAP per ODTP.

The applicable regulation for the No. 2 Paper Machine (Source Code M702) is summarized below.

- Avoidance of 40 CFR 52.21 – Please see section I.E.1 of this narrative.

The applicable regulation for the No. 1 Slaker (Source Code L614) and the No. 2 Slaker (Source Code L615) is summarized below.

- 40 CFR 52.21 BACT – The slakers were modified to vent to the sewer as part of the 1998 Green Liquor Clarifier Project. This eliminated potential particulate matter emissions.
- Avoidance of 40 CFR 52.21 – Please see section I.E.1 of this narrative.

The No. 1 Lime Silo / Elevator (Source Code L636) and No. 2 Lime Silo / Elevator (Source Code L637) were originally installed in 1963. The units are controlled with a venturi scrubber (Source Code C636). The applicable rules and regulations are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: The rule limits PM from a source based on the process input weight.
- 40 CFR 64 – Compliance Assurance Monitoring – Please see section V.C. of this narrative.
- Avoidance of 40 CFR 52.21 – Please see section I.E.1 of this narrative.

The applicable rules for the No. 1 Chipper (Source Code WG14) and No. 2 Chipper (Source Code WG15) are summarized below.

- Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions: The rule limits the opacity of emissions from any source to less than 40 percent.
- Georgia Rule 391-3-1-.02(2)(e) – Particulate Emission from Manufacturing Processes: The rule limits PM from a source based on the process input weight.
- Georgia Rule 391-3-1-.02(2)(n) – Fugitive Dust – The rule requires the facility to take reasonable precautions to limit fugitive dust and to limit the opacity of fugitive sources to less than 20 percent.

Discussion of Amendments

Permit No. 2631-099-0001-V-03-1 was issued to allow the replacement of the existing No. 2 fuel oil-fired auxiliary burners in the No. 1 Recovery Furnace (Source Code R400) with natural gas-fired burners. After the burners' replacement, No. 2 fuel oil would no longer be combusted in the No. 1 Recovery Furnace. In addition, the permit amendment allowed the facility to replace approximately thirty superheater tubes and two pyrosonic openings on the No. 1 Recovery Furnace during the July 2013 unit outage.

Permit No. 2631-099-0001-V-03-2 was issued to modify the Title V permit to include a previously approved minor modification requirement that was inadvertently left out of its Title V Renewal Permit Number 2631-099-0001-V-03-0. Per Permit Number 2631-099-0001-V-02-7, the facility was granted a minor modification related to the pH value required to be measured and recorded in Permit Condition 5.2.2.h. However, the Title V Renewal Permit did not capture this modification in the record keeping/reporting requirements. The minor modification requested the change in pH level because sodium carbonate is formed at the higher pH of 8.2 which plates and plugs the scrubber nozzles, creating operational difficulties. The facility requested a lower pH value, which was granted per Permit Number 2631-099-0001-V-02-7. The facility had since conducted performance tests that showed compliance with the estimated emission limits at a pH of 7.0.

Permit No. 2631-099-0001-V-03-3 was issued to update all applicable permit conditions to specify compliance options allowed under 40 CFR 63, Subpart S for the NCG/SOG Incinerator/Scrubber System (Source ID No. R425). Previously, the permit specified only one option for demonstrating compliance with 40 CFR 63, Subpart S for the NCG/SOG Incinerator /Scrubber System (Source ID NO. R425). Under the facility's then permit (Condition 3.3.20), the facility had to reduce HAP emission from the low-volume, high concentration (LVHC) Kraft pulping system by 98 percent or more by weight when the NCG/SOC Incinerator/Scrubber System is used as the control device per 40 CFR 63.443(d)(1). As specified by the rule, the facility had to conduct emission performance testing for the NSC/SOC Incinerator every five years, with testing due to take place by September 7, 2015 and every 60 months subsequently (Condition 4.2.13). Changes to the configuration of the outlet exhaust ductwork for the NCG/SOG Incinerator /Scrubber System would make it difficult to perform an efficiency test as required by 40 CFR 63, Subpart S because it may not be possible to obtain an accurate outlet exhaust flow rate to calculate the outlet mas HAP emission rate. Therefore, the facility wanted to modify Permit Condition 3.3.20 to incorporate all compliance options provided in 40 CFR 63, Subpart S to reduce HAP emissions from LVHC systems.

Permit No. 2631-099-0001-V-02-4 was issued to address various upgrades and changes to the Tall Oil Plant. The Mill proposed to make the following changes and upgrades to the Tall Oil Plant:

- Replace the existing tall oil reactor with a new unit that is functionally equivalent with the same design production rate. The new reactor mixes raw materials "in-line," and any gases generated from the mixing are directed through the Shower Filter Screening Unit to the Tall Oil Centrifuge Feed Tank, which is vented to the existing scrubber.
- Eliminate the existing Centrifugal Cleaner Tank. The tall oil will be directed to a new centrifuge feed tank, which will be vented to the existing scrubber.
- Replace the existing shower filter screen with two basket-style strainers, which will be referred to as the Shower Filter Screening Unit. This new unit will be a closed system with no vents.

- Replace the two existing centrifuges with one new centrifuge, which will be referred to as the Centrifugal Cleaner unit. This new unit will not have a vent.
- Eliminate the existing spent acid rejects tank.
- Convert the existing Tall Oil Centrifuge Tank to a clean-in-place (CIP) tank. The CIP tank will be used to make batches of caustic solution for cleaning the process equipment. This tank will not have a vent.
- Replace the existing combination Light and Heavy Spent Acid Tank with a new tank of the same function. This new tank is an insignificant emission source and will be vented to the existing scrubber.
- Replace the existing Tall Oil Storage Tank with a new tank of the same function. This new tank will be vented to the atmosphere.

C. Permit Conditions

The facility requested the following changes to Table 3.1 as part of this renewal.

The facility proposed to change the description of the air pollution control devices for the No. 1 and No. 2 Power Boilers from "Multicyclone Venturi Scrubber with caustic solution as scrubbing media or limestone injection system" to "Multicyclone Venturi Scrubber with caustic solution as scrubbing media". The Division will make the proposed changes to the permit.

The facility requested that the No. 4 Power Boiler be removed from the permit as it has been permanently shutdown. The Division will make the requested change and remove the No. 4 Boiler from the permit.

The facility wishes to make the following changes based on Off-permit changes listed in Section I. C above and additional information included in a letter from the facility date March 29, 2019.

- Change Description of "Green Liquor Stabilization Tank (L602) to No. 1 Green Liquor Stabilization Tank (L602).
- Remove No. 1 Green Liquor Clarifier (L603) – The facility requests that the tank is considered an insignificant activity since the vapor pressure of green liquor is less than 10 millimeters of mercury or 0.19 psia.
- Remove No. 2 Green Liquor Clarifier (L604) since it has been removed from service.
- Remove Dregs Washer (L606) The facility requests to remove the dregs filter from the permit and include in the insignificant activities due to emission levels. The Division will make the requested changes.
- Add No. 4 Green Liquor Clarifier (L608)

The Division will make requested changes to the permit.

The facility wishes to correct a typographical error in the description of No. 1 Lime Mud Filter Vacuum Pump (L634) that should be corrected to No. 2 Lime Mud Filter Vacuum Pump (L634). The Division will make the requested changes.

The facility requests to remove the No. 1 and No. 2 Chipper as based on revised emission calculations, the PM emissions are less than the insignificant threshold of five tons per year. The facility requests that these sources be included in the Woodyard Sources (WDYD) in Attachment B of the permit. The Division will make the requested changes.

As part of this renewal the facility requested to remove the applicability of CAM to the No. 1 and No. 2 Power Boilers, No. 2 and No. 3 Recovery Furnaces, No. 1, No. 2 and No. 3 Smelt Dissolving Tanks, and the No. 1 and No. 2 Lime Kilns. The Division will not make the requested changes as it believes that CAM is applicable to these sources as discussed later in this document.

Condition 3.2.1 is an existing condition from Permit No. 2631-099-0001-V-03-0 that limits the combined emissions of PM from the No. 1 Power Boiler and the No. 2 Power Boiler. The condition is a PSD avoidance limit.

Condition 3.2.2 is an existing condition from Permit No. 2631-099-0001-V-03-0 that limits the emissions of SO_2 from each of the No. 1 Power Boiler and the No. 2 Power Boiler to 135 pounds per hour. The purpose of the limit was to reduce SO_2 emissions in order to comply with Best Available Retrofit Technology (BART) exemption modeling. The limits subsume a PSD avoidance limit of 6,162.9 tons per year.

Condition 3.2.3 is an existing condition from Permit No. 2631-099-0001-V-03-0 that limits combined emissions of SAM, NO_x, and CO from the No. 1 Power Boiler and the No. 2 Power Boiler. The condition is a PSD avoidance limit.

Conditions 3.2.4 and 3.2.5 limit the amount of TDF that can be burned in the No. 1 Power Boiler and the No. 2 Power Boiler on an hourly basis and on a daily basis. The conditions are PSD avoidance limits and appeared in Permit No. 2631-099-0001-V-03-0.

Condition 3.2.6 (formerly Condition 3.2.8) is an existing condition from Permit No. 2631-099-0001-V-03-0 for the installation and operation of the No. 5 Package Boiler and No. 6 Package Boiler. The condition is a PSD avoidance requirement and limits the fuel that can be burned in the units to natural gas. This effectively caps the amount of emissions that can be emitted such that the emissions of the backup boilers will not exceed the potential emissions from one of the main steam units (Power Boilers and Recovery Furnaces). As part of this renewal, the facility requested the removal of the PSD Avoidance citation. The Division will not grant this request since at the time of this permit modification, this condition was required to avoid PSD applicability. This condition was modified as part of this renewal to remove the No. 6 Package Boiler.

Condition 3.2.7 (formerly Condition 3.2.9) is an existing condition from Permit No. 2631-099-0001-V-03-0 for the installation and operation of the No. 5 Package Boiler and No. 6 Package Boiler. The condition is a PSD avoidance requirement for greenhouse gases. As part of this renewal, the facility requested the removal of the PSD Avoidance condition. The Division will not grant this request since at the time of this permit modification, this condition was required to avoid PSD applicability. This condition was modified as part of this renewal to remove the No. 6 Package Boiler.

Condition 3.2.8 (formerly Condition 3.2.10) is an existing condition from Permit No. 2631-099-0001-V-03-0 which contains PSD and PSD avoidance limits for the operation the No. 1 Lime Kiln.

Condition 3.2.9 (formerly Condition 3.2.11) is an existing condition from Permit No. 2631-099-0001-V-03-0 which contains PSD and PSD avoidance limits for the operation the No. 2 Lime Kiln.

Conditions 3.2.10 through 3.2.13 (formerly Conditions 3.2.12 through 3.2.15) are existing conditions from Permit No. 2631-099-0001-V-03-0 which are PSD avoidance provisions that limit CaO processing in the kilns on a daily and yearly basis.

Conditions 3.2.14 and 3.2.15 (formerly Conditions 3.2.16 and 3.2.17) are existing conditions for the No. 1 Recovery Furnace and the No. 2 Recovery Furnace that appeared in Permit No. 2631-099-0001-V-03-0. The conditions contain PSD BACT limits for each furnace for PM, SO_2, NO_x, CO, TRS, and opacity.

Condition 3.2.16 (formerly Condition 3.2.18) contains limits for the No. 3 Recovery Furnace. The PM and TRS limits, which are PSD BACT limits, appeared in Permit No. 2631-099-0001-V-03-0. The SO_2 limit is to reduce SO_2 emission in order to comply with BART exemption modeling.

Condition 3.2.17 (formerly Condition 3.2.19) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition limits the amount of fuel oil that can be burned in the No. 3 Recovery Furnace as PSD BACT for SO_2 and SAM.

Condition 3.2.18 (formerly Condition 3.2.20) is an existing condition for the No. 1 Smelt Dissolving Tank and the No. 2 Smelt Dissolving Tank that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains PSD BACT limits for PM, SO_2, and TRS for each smelt dissolving tank.

Condition 3.2.19 (formerly Condition 3.2.21) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The limit is a PSD avoidance condition for lead that restricts the amount of used oil that can be burned at the facility and specifies which units can burn the fuel. The condition also limits the concentration of lead in the used oil. The condition also allows the facility to burn on-site generated used oil in all of the listed units rather than only in the Power Boilers.

Condition 3.2.20 (formerly Condition 3.2.22) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains PSD avoidance limits for NO_x, SO_2, SAM, PM_{10}, and VOC for the NCG/SOG Incinerator/Scrubber System.

Condition 3.2.21 (formerly Condition 3.2.23) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition is a PSD avoidance provision that lists the fuels that can be burned in the NCG/SOG Incinerator. As part of this renewal, the facility requested the removal of propane as a fuel since the equipment does not burn propane. The Division will make the requested change.

Condition 3.2.22 (formerly Condition 3.2.24) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains a PSD avoidance limit for VOC emitted from the No. 2 Paper Machine.

Condition 3.2.23 and 3.2.24 (formerly Conditions 3.2.25 and 3.3.26) are existing conditions that appeared in Permit No. 2631-099-0001-V-03-0. The conditions contain PSD avoidance limits for the amount of pulp processed in the No. 2 Paper Machine on monthly basis and a yearly basis.

Condition 3.2.25 (formerly Condition 3.2.27) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0 that contains a PSD avoidance limit for total PM as emitted from the Lime Silos / Elevators. The facility requested as part of this renewal that the condition be updated to reflect changes made per Permit No. 2631-099-0001-V-02-2 which added a ton per year PSD avoidance limit. The Division will make the requested change.

Condition 3.3.1 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the general applicability statements for 40 CFR 61 Subparts A and E, which apply to the No. 1 Power Boiler and the No. 2 Power Boiler.

Condition 3.3.2 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the general applicability statements for 40 CFR 60 Subparts A and Db, which apply to the No. 1 Recovery Furnace and No. 2 Recovery Furnace.

Condition 3.3.3 is the general applicability statement for 40 CFR 60 Subparts A and Dc, which apply to the No. 5 Package Boiler, the No. 6 Package Boiler and the waste heat boiler on the NCG Incinerator. The condition was appeared in Permit No. 2631-099-0001-V-03-0.

Condition 3.3.4 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the general applicability statements for 40 CFR 60 Subparts A and BB. The provisions apply to the Digester System, Evaporator System, No. 2 Recovery Furnace, No. 1 and No. 2 Smelt Dissolving Tanks, and the Foul Condensate Stripper.

Condition 3.3.5 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the general applicability statements for 40 CFR 63 Subparts A and MM. The provisions apply to all lime kilns, recovery furnaces, and smelt dissolving tanks.

Condition 3.3.6 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the general applicability statements for 40 CFR 63 Subparts A and S, which apply to various parts of the pulp and paper process.

Condition 3.3.7 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the general applicability statement for 40 CFR 63 Subparts A and DDDDD.

Condition 3.3.8 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the mercury limits for burning sludge in the No. 1 Power Boiler and the No. 2 Power Boiler. The requirements are provisions of 40 CFR 61 Subpart E.

Condition 3.3.9 (formerly Condition 3.3.11) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the PM limit for the No. 1 Lime Kiln as required by 40 CFR 63 Subpart MM.

Condition 3.3.10 (formerly Condition 3.3.12) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the PM limit for the No. 2 Lime Kiln as required by 40 CFR 63 Subpart MM.

Condition 3.3.11 (formerly Condition 3.3.13) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains an annual capacity factor limit for fuel oil fired in the No. 1 Recovery Furnace and the No. 2 Recovery Furnace. The limit allows the facility to avoid NO_x requirements under 40 CFR 60 Subpart Db.

Condition 3.3.12 (formerly Condition 3.3.14) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains a requirement that the facility only burn oil that is classified as "very low sulfur oil" in the No. 1 Recovery Furnace and the No. 2 Recovery Furnace. The provision is a requirement of 40 CFR 60 Subpart Db.

Condition 3.3.13 (formerly Condition 3.3.15) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the PM limit for the No. 3 Recovery Furnace as required by 40 CFR 63 Subpart MM.

Condition 3.3.14 (formerly Condition 3.3.16) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition contains the PM limit for the No. 3 Smelt Dissolving Tank as required by 40 CFR 63 Subpart MM.

Condition 3.3.15 (formerly Condition 3.3.17) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the control requirements for TRS gases that are emitted from the Digester System, Multiple-Effect Evaporator System, and the Foul Condensate Stripper System. The facility uses the Incinerator as the primary combustion device and the Lime Kilns as backup combustion devices. The requirements are provisions of 40 CFR 60 Subpart BB and Georgia Rule (gg). As part of this renewal the facility requested that applicability of Rule (gg) be removed from the Foul Condensate Stripper System (R424). The Division will grant that request and remove reference of Georgia Rule (gg) requirements in Section 3.3.

Condition 3.3.16 (formerly Condition 3.3.18) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the control requirements for HAP emissions from equipment specified as LVHC sources under 40 CFR 63 Subpart S.

Condition 3.3.17 (formerly Condition 3.3.19) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition lists the specific control device the facility must use to combust the LVHC gases regulated under 40 CFR 63 Subpart S. The condition also states that the closed vent system must comply with the provisions of 40 CFR 63 Subpart S.

Condition 3.3.18 (formerly Condition 3.3.20) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the HAP reduction that must be achieved during combustion of the LVHC gases. This is a requirement of 40 CFR 63 Subpart S. This condition was modified per Permit No. 2631-099-0001-V-03-1 to incorporate all compliance options provided in 40 CFR 63, Subpart S to reduce HAP emissions from LVHC systems.

Condition 3.3.19 (formerly Condition 3.3.21) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the HAP collection requirement for condensate regulated under 40 CFR 63 Subpart S (Phase I). The condition also lists the specific streams the facility uses to meet the requirements.

Condition 3.3.20 (formerly Condition 3.3.22) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. This condition defines a closed collection system that is designed and operated to meet the requirements provided in 40 CFR 63, Subpart S.

Condition 3.3.21 (formerly Condition 3.3.23) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the HAP treatment requirement for the condensate regulated under 40 CFR 63 Subpart S (Phase I). The condition also lists the specific streams the facility uses to meet the requirements and that the Foul Condensate Stripper is used to treat the condensate.

Condition 3.3.22 (formerly Condition 3.3.24) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the HAP reduction requirement for compliance with the Clean Condensate Alternative under 40 CFR 63 Subpart S. The condition specifies that the reductions will be achieved through the Brownstock Washers and the Smelt Dissolving Tanks.

Condition 3.3.23 (formerly Condition 3.3.25) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies operating practices the facility must comply with for the Brownstock Washers and Smelt Dissolving Tanks in order to take to Clean Condensate Alternative reduction credits. This is a requirement of 40 CFR 63 Subpart S.

Condition 3.3.24 (formerly Condition 3.3.26) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition lists the specific closed vent system and bypass line requirements for gas streams controlled under 40 CFR 63 Subpart S.

Condition 3.2.25 (formerly Condition 3.3.27) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies affirmative defense per 40 CFR 63 Subpart S.

Condition 3.3.26 was added as part of this renewal to require compliance with applicable emission limits and work practice standards of 40 CFR 63, Subpart DDDDD for the No. 1, No. 2, No. 5, and No. 6 Boilers.

Condition 3.3.27 was added as part of this renewal to require compliance with applicable 40 CFR 63, Subpart DDDDD tables during periods of startup and shutdown for the No. 1, No. 2, No. 5, and No. 6 Boilers.

Condition 3.3.28 was added as part of this renewal to require compliance with periodic tune ups per 40 CFR 63, Subpart DDDDD for the No. 1, No. 2, No. 5, and No. 6 Boilers.

Condition 3.3.29 was added as part of this renewal to specify the boiler subcategory for No. 5 and No. 6 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 3.3.30 was added as part of this renewal to specify the tune up requirements per 40 CFR 63, Subpart DDDDD.

Condition 3.3.31 was added as part of this renewal to specify the tune up requirements for No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 3.3.32 was added as part of this renewal to limit the fuel usage and type for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 3.3.33 was added as part of this renewal to limit the moisture content of the biomass or bio-based solid fuel fired in the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 3.3.34 was added as part of this renewal to specify specifies the specific HCl, Mercury, Filterable PM (or TSM) and CO emission limitations for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 3.3.35 was added as part of this renewal to specify continuous compliance demonstration per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Condition 3.3.36 was added as part of this renewal to specify specifies the specific work practice standards per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.
Condition 3.4.1 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition is a general requirement under Georgia Rule (b) that limits the opacity of emissions from process equipment.

Condition 3.4.2 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition is a general requirement under Georgia Rule (e) that limits PM emissions from sources based on process throughput.

Condition 3.4.3 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition limits the emission of PM from the No. 1 Power Boiler and No. 2 Power Boiler based on the heat input to each unit.

Condition 3.4.4 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. . The condition lists the fuels that are permitted to be burned in the No. 1 Power Boiler and the No. 2 Power Boiler. The condition has been listed with a general citation because these fuels are not restricted due to a specific rule or regulation.

Condition 3.4.5 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition limits the amount of primary clarifier sludge that can be burned in the No. 1 Power Boiler and the No. 2 Power Boiler. The limit represents the amount of sludge that was burned during performance testing that demonstrated compliance with 40 CFR 61 Subpart E. The limit was placed in the permit under a general citation to ensure applicable regulations would be reviewed prior to increasing sludge firing rates.

Condition 3.4.6 (formerly Condition 3.4.7) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. This condition limits PM and opacity from the No. 5 Package Boiler, No. 6 Package Boiler, and the waste heat boiler on the NCG Incinerator. The condition is a requirement of Georgia Rule (d).

Condition 3.4.7 (formerly Condition 3.4.8) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition limits the sulfur content of fuel that is burned in the Power Boilers, Lime Kilns, and the No. 3 Recovery Furnace. This is a requirement of Georgia Rule (g).

Condition 3.4.8 (formerly Condition 3.4.9) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition limits the emission of TRS from the No. 1 Lime Kiln and the No. 2 Lime Kiln. This is a requirement of Georgia Rule (gg).

Condition 3.4.9 (formerly Condition 3.4.10) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition limits the emission of TRS from the No. 3 Smelt Dissolving Tank. This is a requirement of Georgia Rule (gg).

Condition 3.4.10 (formerly Condition 3.4.11) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to operate the scrubber at all time when operating the NCG/SOG Incinerator. The condition appears under a general applicability citation.

Condition 3.4.11 (formerly Condition 3.4.12) is an existing condition that appeared in Permit No. 2631-099-0001-V-02-0. The condition requires the facility to minimize fugitive emissions and limit the opacity from fugitive sources to less than 20 percent.

Condition 3.4.12 was added as part of this renewal the since the facility requested that applicability of Rule (gg) be removed from the Foul Condensate Stripper System (R424) in Condition 3.3.15. The condition lists the applicable equipment subject to Georgia Rule (gg).

Conditions Not Included in the Renewal Permit

Permit No. 2631-099-0001-V-03-0, Condition 3.2.6: The condition contained PSD avoidance limits that restrict the amount of NO_x and SO_2 that could be emitted from the No. 4 Package Boiler. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 3.2.7: The condition was a PSD avoidance requirement that limited the type and fuel sulfur content of fuels that could be burned in the No. 4 Package Boiler. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 3.3.9: The condition contained the NO_x limit for the No. 4 Package Boiler as required by 40 CFR 60 Subpart Db. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 3.3.10: The condition contained the opacity limit for the No. 4 Package Boiler as required by 40 CFR 60 Subpart Db. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 3.4.6: This condition limited the emission of PM from the No. 4 Package Boiler based on the heat input to the unit. The requirement is a provision of Georgia Rule (d). The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

The facility requested that Condition 4.1.3 is modified to add the following:

- Method 26 or 26A for the determination of the concentration of HCl per 40 CFR 63 Subpart DDDDD.
- Method 29, 30A, 101A or ASTM Method for the determination of the concentration per 40 CFR 63 Subpart DDDDD.

The Division made the requested changes.

B. Specific Testing Requirements

Condition 4.2.1 summarizes the periodic testing requirements for the Power Boilers, Lime Kilns, Recovery Furnaces, and Smelt Dissolving Tanks. The condition appeared in Permit No. 2631-099-0001-V-03-0. The facility, as part of this permit renewal, requested adding the requested annual NO_x compliance test discussed later in this document. The Division will not grant the request as it is not believed that the proposed NO_x testing changes will provide adequate compliance assurance with the applicable NO_x limits. This condition was modified as part of this renewal to update the testing frequency for the No. 1, No. 2, and No. 3 Smelt Dissolving tanks to every five years and remove 'within 90 days of the issuance of this permit' as this schedule is no longer applicable. In addition, this condition was modified as part of this renewal to indication that SO_2 testing is not applicable to the No.3 Smelt Dissolving Tank.

Condition 4.2.2 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies how the facility must calculate average weight emission rates for PM emitted from the No. 1 Power Boiler and the No. 2 Power Boiler in order to demonstrate compliance with the PSD avoidance condition.

Condition 4.2.3 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies that the facility cannot make changes to the sludge firing rates for the No. 1 Power Boiler and No. 2 Power Boiler without conducting preliminary calculations. This is a requirement of 40 CFR 61 Subpart E.

Condition 4.2.4 (formerly Condition 4.2.6) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to conduct NO_x emission tests for the No. 1 Recovery Furnace and the No. 2 Recovery Furnace for each renewal permit in order to demonstrate compliance with NO_x PSD limits. The testing is used to establish black liquor nitrogen content limits as surrogate parameters. The facility, as part of this permit renewal, requested an annual NO_x compliance test in lieu of nitrogen content analysis of black liquor solids every 120 days to compare to the baseline value obtained during the NO_x compliance test required as a compliance option for the NO_x emission limits listed in Condition 3.2.14. The Division will not grant the request as it is not believed that the proposed NO_x testing changes will provide adequate compliance assurance with the applicable NO_x limits.

Conditions 4.2.5 and 4.2.6 (formerly Conditions 4.2.7 and 4.2.8) are existing conditions that appeared in Permit No. 2631-099-0001-V-03-0. The conditions are a requirement of 40 CFR 63 Subpart MM and specify how the facility must use test data to establish operating parameters for the Lime Kilns, Recovery Furnaces, and Smelt Dissolving Tanks.

Conditions 4.2.7 and 4.2.8 (formerly Conditions 4.2.9 and 4.2.10) are existing conditions that appeared in Permit No. 2631-099-0001-V-03-0. The conditions are requirements of 40 CFR 63 Subpart MM and specify the data that must be collected during PM performance testing for the Lime Kiln, Recovery Furnaces, and Smelt Dissolving Tanks.

Condition 4.2.9 (formerly Condition 4.2.11) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the periodic performance testing that must be completed to demonstrate ongoing compliance with the Clean Condensate Alternative under 40 CFR 63 Subpart S. The condition has been updated for the renewal to remove reference to the initial performance test, which has been completed.

Condition 4.2.10 (formerly Condition 4.2.12) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the operating parameters that must be monitoring during performance testing conducted in accordance with Condition 4.2.11. This is a requirement of 40 CFR 63 Subpart S.

Condition 4.2.11 (formerly Condition 4.2.13) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition lists the frequency of performance test for sources subject to limitations under 40 CFR 63 Subpart S. As part of this renewal, the facility requests that the condition is modified to remove reference to past dates. The Division will modify the permit condition as requested.

Condition 4.2.12 (formerly Condition 4.2.14) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition specifies the reporting schedule performance test reports for sources subject to limitations under 40 CFR 63 Subpart S.

Condition 4.2.13 was added as part of this permit renewal. The condition lists the frequency of performance test for sources for sources subject to limitations under 40 CFR 63 Subpart MM.

Condition 4.2.14 was added as part of this renewal. This condition specifies pollutant testing per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Condition 4.2.15 was added as part of this renewal. This condition specifies performance testing reporting per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Condition 4.2.16 was added as part of this renewal. This condition requires a site-specific test plan per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Condition 4.2.17 was added as part of this renewal. This condition requires a site-specific fuel monitoring plan per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Condition 4.2.18 was added as part of this renewal. This condition specifies initial and subsequent performance testing per 40 CFR 63, Subpart DDDDD for the No. 1 or No. 2 Boilers.

Condition 4.2.19 was added as part of this renewal. This condition specifies performance testing for chloride input testing per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Condition 4.2.20 was added as part of this renewal. This condition specifies the operating limits testing per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Condition 4.2.21 was added as part of this renewal. This condition specifies performances testing for CO per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Condition 4.2.22 was added as part of this renewal. This condition specifies biomass fuel moisture content analysis schedule per 40 CFR 63, Subpart DDDDD for the No. 1 and No. 2 Boilers.

Conditions Not Included in the Renewal Permit

Permit No. 2631-099-0001-V-03-0, Condition 4.2.4: This condition was a requirement of 40 CFR 60 Subpart Db and specified the NO_x CEMS data collection requirements for the No. 4 Package Boiler. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 4.2.5: This condition was a requirement of 40 CFR 60 Subpart Db and contained the definition of steam-generating unit operating day. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1.a is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor SO_2, NO_x, and CO for the No. 1 and No. 2 Power Boilers. The CEMS are used to demonstrate compliance with PSD avoidance and BART exemption limits.

Condition 5.2.1.b (formerly Condition 5.2.1.c) requires the facility to continuously monitor TRS, O_2, and SO_2 for the No. 1 and No. 2 Lime Kilns. The condition appeared in Permit No. 2631-099-0001-V-03-0. The monitoring is used to demonstrate compliance with PSD avoidance limits and Georgia Rule (gg) limits.

Condition 5.2.1.c (formerly Condition 5.2.1.d) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor opacity, TRS, O_2, and SO_2 from the No. 1 and No. 2 Recovery Furnaces. The CEMS and COMS are used to demonstrate compliance with PSD limits and limits under 40 CFR 63 Subpart MM, 40 CFR 60 Subpart BB, and Georgia Rule (gg).

Condition 5.2.1.d (formerly Condition 5.2.1.) requires the facility to continuously monitor opacity, TRS, O_2, and SO_2 from the No. 3 Recovery Furnace. The condition appeared in Permit No. 2631-099-0001-V-03-0. The CEMS and COMS are used to demonstrate compliance with PSD and BART Exemption limits and limits under 40 CFR 63 Subpart MM, Georgia Rule (gg), and Georgia Rule (b).

Condition 5.2.2.a is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor operating parameters for the scrubbers on the No. 1 and No. 2 Power Boilers. The proper operation of the scrubbers provides a reasonable assurance of compliance with PM and opacity limits under PSD avoidance, Georgia Rule (d), and Georgia Rule (b).

Condition 5.2.2.b (formerly Condition 5.2.2.c) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor operating parameters for the scrubbers on the No. 1 and No. 2 Lime Kilns. The proper operation of the scrubbers provides a reasonable assurance of compliance with PM and opacity limits under PSD avoidance, 40 CFR 63 Subpart MM, Georgia Rule (e), and Georgia Rule (b).

Condition 5.2.2.c (formerly Condition 5.2.2.d) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor operating parameters for the scrubbers on the No. 1 and No. 2 Smelt Dissolving Tanks. The proper operation of the scrubbers provides a reasonable assurance of compliance with PM, TRS, SO_2, and opacity limits under PSD, 40 CFR 63 Subpart MM, Georgia Rule (gg), Georgia Rule (e), and Georgia Rule (b).

Condition 5.2.2.d (formerly Condition 5.2.2.e) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor operating parameters for the scrubber on the No. 3 Smelt Dissolving Tank. The proper operation of the scrubber provides a reasonable assurance of compliance with PM, TRS, and opacity limits under 40 CFR 63 Subpart MM, Georgia Rule (gg), Georgia Rule (e), and Georgia Rule (b).

Condition 5.2.2.e (formerly Condition 5.2.2.f) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor temperature for the NCG/SOG Incinerator. The proper operation of the incinerator provides a reasonable assurance of compliance with HAP and TRS control requirements under 40 CFR 63 Subpart S, 40 CFR 60 Subpart BB, and Georgia Rule (gg).

Condition 5.2.2.f (formerly Condition 5.2.2.g) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor operating parameters for the scrubber on the NCG/SOG Incinerator. The proper operation of the scrubber provides a reasonable assurance of compliance with PM, SO_2, TRS, SAM, and opacity limits under PSD avoidance, Georgia Rule (e), and Georgia Rule (b).

Condition 5.2.2.g (formerly Condition 5.2.2.h) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor operating parameters for the Foul Condensate Stripper. The proper operation of the stripper provides a reasonable assurance of compliance with HAP treatment requirements under 40 CFR 63 Subpart S.

Condition 5.2.2.h (formerly Condition 5.2.2.i) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor flow rates for condensate streams used to comply with 40 CFR 63 Subpart S. The data is used to demonstrate compliance with HAP collection and treatment provisions.

Condition 5.2.2.i (formerly Condition 5.2.2.j) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to continuously monitor operating parameters for the scrubber on the Lime Silos / Elevators. The proper operation of the scrubber provides a reasonable assurance of compliance with PM and opacity limits under PSD avoidance, Georgia Rule (e), and Georgia Rule (b).

Condition 5.2.2.j is a new condition added as part of this renewal. The condition provides an alternative to pressure drop measurements for smelt dissolvent tank dynamic scrubbers per amended 40 CFR 63, Subpart MM.

Condition 5.2.3.a is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to monitor and record fuel usage for the Power Boilers. The condition is used to gather data for demonstrating compliance with fuel usage/sulfur limits, SAM limits, and mercury limits under PSD avoidance, 40 CFR 61 Subpart E, and Georgia Rule (g).

Condition 5.2.3.b is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to monitor and record the CaO production rate for the Lime Kilns. The data is required to be collected under 40 CFR 63 Subpart MM and to demonstrate compliance with the CaO production limit under PSD avoidance.

Condition 5.2.3.c is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to monitor and record the BLS firing rate and the weight percent of the BLS for the Recovery Furnaces. The data is required to be collected under 40 CFR 63 Subpart MM.

Condition 5.2.3.d is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to monitor and record the fuel usage for the Recovery Furnaces. The condition is used to gather data for demonstrating compliance with fuel oil usage/sulfur limits and fuel limitations under 40 CFR 60 Subpart Db.

Condition 5.2.3.e is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to monitor operating parameters for the Recovery Furnace ESPs. The proper operation of the ESPs provides a reasonable assurance of compliance with the PM and opacity limits under PSD, 40 CFR 63 Subpart MM, 40 CFR 63 Subpart BB, Georgia Rule (e), and Georgia Rule (b).

Condition 5.2.4 is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to conduct sampling for on-site used oil. The analysis is used to demonstrate compliance with the lead concentration limits under a PSD avoidance condition.

Condition 5.2.5 (formerly Condition 5.2.8) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to conduct nitrogen sampling for black liquor fired in the No. 1 and No. 2 Recovery Furnaces. The data is used to demonstrate compliance with NO_x limits under a PSD BACT analysis. The facility, as part of this permit renewal requested an annual NO_x compliance test in lieu of nitrogen content analysis of black liquor solids every 120 days to compare to the baseline value obtained during the NO_x compliance test required in Condition 4.2.5 as a compliance option for the NO_x emission limits listed in Condition 3.2.14. The Division will not grant the request as it is believed that the proposed NO_x testing changes will not provide adequate compliance assurance with the applicable NO_x limits.

Condition 5.2.6 (formerly Condition 5.2.9) is an existing condition that appeared in Permit No. 2631-099-0001-V-03-0. The condition requires the facility to perform QA/QC checks for the SO_2 CEMS on the No. 3 Recovery Furnace. The SO_2 CEMS is used to demonstrate compliance with the BART Exemption limit.

Conditions 5.2.7 through 5.2.9 (formerly Condition 5.2.10 through 5.2.12) are existing conditions that appeared in Permit No. 2631-099-0001-V-02-0. The conditions specify the QA/QC and accuracy requirements for the Recovery Furnace COMS and scrubber CPMS for the Lime Kilns and Smelt Dissolving Tanks. The specifications are a requirement of 40 CFR 63 Subpart MM. Condition 5.2.8.e was added as part of this renewal to specify updated COMs monitoring requirements per the amended 40 CFR 63 Subpart MM.

Conditions 5.2.10 and 5.2.11 were added as part of this renewal to specify updated monitoring requirements per amended 40 CFR 63 Subpart MM for CMS data quality assurance procedures and monitoring data, respectively.

Conditions 5.2.12 through 5.2.17 (formerly Conditions 5.2.13 through 5.2.18) are existing conditions that appeared in Permit No. 2631-099-0001-V-03-0. The conditions contain various requirements that are used to demonstrate compliance with 40 CFR 63 Subpart S. The requirements include operating the continuous monitoring systems, maintaining the closed vent and collection systems in accordance with the subpart, and carrying out the sampling and work practice standards associated with the Clean Condensate Alternative. As part of this renewal the facility requested that former Conditions 5.2.16 and 5.2.17 (now Conditions 5.2.11 and 5.2.12) be modified to reflect the stated monitoring schedule in 40 CFR 63 Subpart S. The Division will not grant this request as the Division believes that current wording of these conditions provide specific inspection schedule requirements that it deems are an adequate means of demonstrating compliance and in line with the frequency requirements of 40 CFR 63, Subpart S.

Conditions 5.2.18 through Conditions 5.2.26 (formerly Conditions 5.2.19 through 5.2.28) contain the CAM requirements for the facility. These conditions were included in Permit No. 2631-099-0001-V-03-0. As part of this renewal the facility requested the modification of Condition 5.2.21 removal of Conditions 5.2.22 through 5.2.26 to remove the applicability of CAM to the No. 1 and No. 2 Power Boilers, No. 2 and No. 3 Recovery Furnaces, No. 1, No. 2 and No. 3 Smelt Dissolving Tanks, and the No. 1 and No. 2 Lime Kilns. The Division will not make the requested changes as it believes that CAM is applicable to these sources as discussed later in this document.

Condition 5.2.27 is being added as part of this renewal include to proper operation of the electrostatic precipitators automatic voltage control per amended 40 CFR 63 Subpart MM.

Condition 5.2.28 was added as part of this renewal added specifies the requirements of boiler tune-ups per 40 CFR 63, Subpart DDDDD for the applicable boilers.

Condition 5.2.29 was added as part of this renewal specifies continuous pollutant or parameter monitoring systems for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 5.2.30 was added as part of this renewal specifies continuous scrubber parameter monitoring systems for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 5.2.31 was added as part of this renewal specifies requires steam flow for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 5.2.32 was added as part of this renewal requires a startup and shutdown plan for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 5.2.33 was added as part of this renewal requires a site-specific monitoring plan for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 5.2.34 was added as part of this renewal specifies what must be addressed by a site-specific monitoring plan for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 5.2.35 was added as part of this renewal requires periodic performance evaluations for the monitoring systems for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 5.2.36 was added as part of this renewal requires data collection per the monitoring plan for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

C. Compliance Assurance Monitoring (CAM)

The mill operates units that are considered *pollutant specific emission units* (PSEUs) per Part 64 because they are (1) subject to a pollutant emission standard for which there is a control device, and (2) the pre-control potential emission for the pollutant is greater than the major source threshold.

The frequency of data collection under Part 64 depends on whether or not the controlled potential to emit exceeds the major source threshold (i.e., whether the PSEU is a large PSEU). A large PSEU requires continuous monitoring while a PSEU that is not classified as large requires monitoring at least once per 24-hour period. The information for the CAM units at the mill is summarized below:

Emission Unit	Pollutant	Control Device	Potential Emissions (tpy)		Large PSEU?
			Uncontrolled	Controlled	
No. 1 and No. 2 Power Boilers	PM	Scrubber	>100	738 (each)	Yes
No. 1 and No. 2 Power Boilers	SO_2	Scrubbers or Limestone	>100	591 (each)	Yes
No. 1 Lime Kiln	PM	Scrubber	>100	66.5	No
No. 2 Lime Kiln	PM	Scrubber	>100	46.9	No
No. 1 and No. 2 Recovery Furnaces	PM	ESPs	>100	154 (each)	Yes
No. 3 Recovery Furnace	PM	ESP	>100	199	Yes
No. 1 and No. 2 Smelt Dissolving Tanks	PM	Scrubbers	>100	31.5 (each)	No
No. 3 Smelt Dissolving Tank	PM	Scrubber	>100	188	Yes
Lime Silos / Elevators	PM	Scrubber	>100	5.5 (each)	No

Conditions Not Included in the Renewal Permit

Permit No. 2631-099-0001-V-03-0, Condition 5.2.1.b: This condition required the facility to continuously monitor NO_x and opacity for the No. 4 Package Boiler. The CEMS and COMS were used to demonstrate compliance with 40 CFR 60 Subpart Db and Georgia Rule (d). The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 5.2.2.b: This condition required the facility to continuously monitor fuel usage for the No. 4 Package Boiler. The records were used to calculate SO_2 and NO_x emissions for PSD avoidance limits and to gather operating data for 40 CFR 60 Subpart Db. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Conditions 5.2.5 through 5.2.7: These conditions specified the CEMS/PEMS data and QA/QC requirements for the NO_x monitor installed on the No. 4 Package Boiler. The monitor was used to comply with the requirements of 40 CFR 60 Subpart Db. The No. 4 Package Boiler has been removed from service so these conditions are no longer necessary.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a quarterly basis.

Condition 6.1.7.a.i specifies as an excess emission any 24-hour period during which the CEMS on the No. 1 or No. 2 Power Boiler indicates a unit has exceeded the BART Exemption SO_2 limit. The condition was included in Permit No. 2631-099-0001-V-03-0.

Conditions 6.1.7.a.ii and 6.1.7.a.iii (formerly Conditions 6.1.7.a.iv and 6.1.7.a.v) specify as an excess emission any 3-hour period during which the SO_2 CEMS on the No. 1 or No. 2 Lime Kiln indicates a unit has exceeded the PSD avoidance limits in Part 3.2 of the permit. The conditions were included in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.iv (formerly Condition 6.1.7.a.vi) specifies as an excess emission any 24-hour period during which the CEMS on the No. 1 or No. 2 Lime Kiln indicates a unit has exceeded the TRS limit under Georgia Rule (gg). The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.v (formerly Condition 6.1.7.a.vii) specifies as an excess emission any 12-hour period during which the CEMS on the No. 1 or No. 2 Recovery Furnace indicates a unit has exceeded the TRS limits under PSD BACT, 40 CFR 63 Subpart BB, and Georgia Rule (gg). The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.vi (Condition 6.1.7.a.viii) specifies as an excess emission any 12-hour period during which the CEMS on the No. 3 Recovery Furnace indicates a unit has exceeded the TRS limits under PSD BACT. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.vii (formerly Condition 6.1.7.a.ix) specifies as an excess emission any 3-hour period during which the CEMS on the No. 1 or No. 2 Recovery Furnace indicates a unit has exceeded the SO_2 limits under PSD BACT. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.viii (formerly Condition 6.1.7.a.x) specifies as an excess emission any 3-hour period during which the CEMS on the No. 1 or No. 2 Recovery Furnace indicates a unit has exceeded the SO_2 limits under PSD BACT. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.ix (formerly Condition 6.1.7.a.xi) specifies as an excess emission any 6-minute period during which the COMS on the No. 1 or No. 2 Recovery Furnace indicates a unit has exceeded the opacity limit under PSD BACT. Opacity monitoring is also required for demonstrating compliance with 40 CFR 60 Subparts Db and BB. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.x (formerly Condition 6.1.7.a.xii) specifies as an excess emission any block 24-hour period during which the CEMS on the No. 3 Recovery Furnace indicates that the unit has exceeded the BART Exemption SO_2 limit. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xi (formerly Condition 6.1.7.a.xiii) specifies as an excess emission any 12-hour period during which the CEMS on the No. 3 Recovery Furnace indicates that the unit has exceeded the TRS limit under PSD BACT. The monitoring also demonstrates compliance with Georgia Rule (gg). The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xii (formerly Condition 6.1.7.a.xiv) specifies as an excess emission any 6-minute period during which the COMS on the No. 3 Recovery Furnace indicates that the unit has exceeded the opacity limit under Georgia Rule (b). The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xiii (formerly Condition 6.1.7.a.xv) specifies as an excess emission any period greater than 5-minutes during which the temperature for the NCG/SOG Incinerator is less than the value prescribed by regulation or by performance testing. This is a requirement of 40 CFR 60 Subpart BB and Georgia Rule (gg). The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xiv (formerly Condition 6.1.7.a.xvi) specifies as an excess emission any period of time the NCG/SOG Incinerator is operated without the simultaneous operation of the scrubber. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xv (formerly Condition 6.1.7.a.xvii) specifies as an excess emission any 3-hour period during which the temperature for the NCG/SOG Incinerator is less than 1244 degrees Fahrenheit. This monitoring is used to demonstrate compliance with limits under PSD avoidance, 40 CFR 63 Subpart S, and Georgia Rule (e). The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xvi (formerly Condition 6.1.7.a xviii) specifies as an excess emission any 3-hour period during which an operating parameter for the Foul Condensate Stripper is outside of the prescribed range. This is a requirement of 40 CFR 63 Subpart S and appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xvii (formerly Condition 6.1.7.a.xix) specifies the allowances for reporting excess emissions for control devices operated in accordance with 40 CFR 63 Subpart S. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xviii (formerly Condition 6.1.7.a.xx) specifies the Foul Condensate Stripper excess emissions per 40 CFR Subpart S. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.a.xix (formerly Condition 6.1.7.a.xxi) specifies as an excess emission any 15-day period during which the facility does not achieve the HAP reductions required under the Clean Condensate Alternative of 40 CFR 63 Subpart S. The condition appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.i specifies as an exceedance any 12-month period during which emissions of SAM, NO_X, or CO from the No. 1 and No. 2 Power Boilers combined exceeds the PSD avoidance limit. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.ii specifies as an exceedance any 3-hour period during which the amount of TDF fired in the No. 1 and No. 2 Power Boilers combined exceeds the PSD avoidance hourly limit. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.iii specifies as an exceedance any day during which the amount of TDF fired in the No. 1 and No. 2 Power Boilers combined exceeds the PSD avoidance daily limit. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.iv specifies as an exceedance any day during which the amount of sludge burned in the No. 1 and No. 2 Power Boilers combined exceeds the limit found in Part 3.4 of the permit. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.v (formerly Condition 6.1.7.b.viii) specifies as an exceedance any 12-month period during which emissions of total PM, PM_{10}, NO_X, CO, TRS, Pb, VOC, or SAM from the No. 1 Lime Kiln exceed the PSD avoidance limit. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.vi (formerly Condition 6.1.7.b.ix) specifies as an exceedance any 12-month period during which emissions of total PM, PM_{10}, NO_X, CO, TRS, Pb, VOC, or SAM from the No. 2 Lime Kiln exceed the PSD avoidance limit. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Conditions 6.1.7.b.vii through 6.1.7.b.x (formerly Conditions 6.1.7.b.x through 6.1.7.b.xiii) specify as an exceedance any 30-day period or 12-month period during which CaO production from the No. 1 or No. 2 Lime Kiln exceeds the short-term or long-term PSD avoidance limit. These requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xi (formerly Condition 6.1.7.b.xiv) specifies as an exceedance any period of process operation during which the annual capacity factor for oil burned in the No. 1 or No. 2 Recovery Furnace exceeds the 40 CFR 60 Subpart Db avoidance condition for NO_X. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xii (formerly Condition 6.1.7.b.xv) specifies as an exceedance any period of process operation during which the fuel oil burned in the No. 1 or No. 2 Recovery Furnace does not meet the definition of very low sulfur fuel oil as required by 40 CFR 60 Subpart Db. The requirement appeared in Permit No. 2631-099-0001-V-02-0.

Condition 6.1.7.b.xiii (formerly Condition 6.1.7.b.xvi) specifies as an exceedance any 12-month period during which the amount of fuel oil burned in the No. 3 Recovery Furnace exceeds the PSD avoidance limit. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xiv (formerly Condition 6.1.7.b.xvii) specifies as an exceedance any period of process operation during which the sulfur content of the fuel burned in the Lime Kilns, Power Boilers, or No. 3 Recovery Furnace exceeds the amount allowed by Georgia Rule (g). The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xv (formerly Condition 6.1.7.b.xviii) specifies as an exceedance any period of process operation during which the lead concentration for used oil burned at the site exceeds the amount allowed by the PSD avoidance limit. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xvi (formerly Condition 6.1.7.b.xix) specifies as an exceedance any 12-month period during which the amount of used oil fired in the Lime Kilns, Power Boilers, and No. 3 Recovery Furnace combined exceeds the amount allowed by the PSD avoidance limit. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xvii (formerly Condition 6.1.7.b.xx) specifies the violation provisions for opacity of emissions from the Recovery Furnaces. This is a requirement of 40 CFR 63 Subpart MM. The requirement appeared in Permit No. 2631-099-0001-V-03-0. This condition was modified as part of this renewal to update the percentage of operating time from six percent to two percent per amended 40 CFR 63 Subpart MM.

Condition 6.1.7.b.xviii (formerly Condition 6.1.7.b.xxi) specifies the violation provisions for the operation of scrubbers on the Lime Kilns and Smelt Dissolving Tanks. This is a requirement of 40 CFR 63 Subpart MM. The requirement appeared in Permit No. 2631-099-0001-V-03-0. As part of this renewal, the facility requested that 6.1.7.b.viiiA through 6.1.7.b.viiiJ be modified to add "or the values at which compliance with 40 CFR 63, Subpart MM was most recently demonstrated". The Division will make the requested changes.

Condition 6.1.7.b.xix (formerly Condition 6.1.7.b.xxii) specifies as an exceedance any 15-day rolling period that the facility does not collect at least 7.2 pounds of total HAP per ton of ODP from the Phase I pulping condensates. This is a requirement of 40 CFR 63 Subpart S. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xx (formerly Condition 6.1.7.b.xxiii) specifies as an exceedance any 15-day rolling period that the facility does not treat at least 6.6 pounds of total HAP per ton of ODP from the Phase I pulping condensates. This is a requirement of 40 CFR 63 Subpart S. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xxi (formerly Condition 6.1.7.b.xxiv) specifies as an exceedance any 5-minute period during which HAP emissions from the LVHC system are not controlled. This is a requirement of 40 CFR 63 Subpart S. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xxii (formerly Condition 6.1.7.b.xxv) specifies as an exceedance any 12-month period during which VOC emissions from the No. 2 Paper Machine exceeds the PSD avoidance limit. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.b.xxiii and 6.1.7.b.xxiv (formerly Conditions 6.1.7.b.xxvi and 6.1.7.b.xxvii) specify as an exceedance any 30-day period or 12-month period during which pulp processing on the No. 2 Paper Machine exceeds the short-term or long-term PSD avoidance limit. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.c.i specifies as an excursion any 3-hour period during which an operating parameter for a scrubber on the No. 1 or No. 2 Power Boiler is out of the prescribed range. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.c.ii specifies as an excursion any 3-hour period during which an operating parameter for a scrubber on the No. 1 or No. 2 Lime Kiln is out of the prescribed range. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.c.iii specifies as an excursion any three consecutive readings that the total power for an ESP on a Recovery Furnace is lower than the prescribed minimum value. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.c.iv specifies as an excursion any time the nitrogen content of the black liquor fired in the No. 1 or No. 2 Recovery Furnace exceeds a value that indicates compliance with the PSD BACT NO_x limits. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.c.v specifies as an excursion any 3-hour period during which an operating parameter for a scrubber on a Smelt Dissolving Tank is out of the prescribed range. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.c.vi specifies as an excursion any 3-hour period during which an operating parameter for the scrubber on the NCG/SOG Incinerator is out of the prescribed range. The requirement appeared in Permit No. 2631-099-0001-V-03-0. Per Permit No. 2631-099-0001-V-03-2 Condition 6.1.7.vi(A) was modified to update the pH value from 8.2 to 7.0.

Condition 6.1.7.c.vii specifies as an excursion any 4-hour period during which an operating parameter for the scrubber on the Lime Silos / Elevators is out of the prescribed range. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.d.i requires the facility to provide reports of the annual capacity factor for oil burned in the No. 1 and No. 2 Recovery Furnace. The reports are used to demonstrate compliance with the NO_X avoidance limit under 40 CFR 60 Subpart Db. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.d.ii requires the facility to provide reports that the black liquor fired in the No. 1 and No. 2 Recovery Furnace is free of nitrogen based additives. The reports are used to demonstrate compliance with the PSD BACT NO_x limits in Part 3.0 of the permit. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.d.iii requires the facility to provide reports of the oil analysis performed for residual and used oil. The reports are used to demonstrate compliance with PSD avoidance limits relating to lead and with sulfur limits under Georgia Rule (g). The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.d.iv requires the facility to provide reports of the amount of used oil received at the site each month. The reports provide a reasonable assurance that analyses are occurring as required. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.d.v requires the facility to provide information indicating that all necessary certifications have been maintained for the fuel oil burned at the facility. The reports provide a reasonable assurance that the fuel burned at the facility meets the various limits in Part 3.0 of the permit. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.1.7.d.vi requires the facility to provide a list of all current operational parameters established in accordance with the periodic testing in Part 4.0 of the permit. The reports provide a reasonable assurance of ongoing compliance with emission limits. The requirement appeared in Permit No. 2631-099-0001-V-04-0.

Condition 6.1.7.d.vii requires the facility to provide opacity reports for the Recovery Furnaces. The data is used to demonstrate compliance with 40 CFR 63 Subpart MM. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Conditions 6.1.7.d.viii through 6.1.7.d.xiv require the facility to provide reports of occasions that it does not comply with the Clean Condensate Alternative plan established in accordance with 40 CFR 63 Subpart S. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Conditions Not Included in the Renewal Permit

Permit No. 2631-099-0001-V-03-0, Condition 6.1.7.a.ii: This condition specified as an excess emission any rolling 30-day period during which the CEMS on the No. 4 Package Boiler indicated the unit has exceeded the 40 CFR 60 Subpart Db NO_x limit. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 6.1.7.a.iii: This condition specified as an excess emission any 6-minute period during which the COMS on the No. 4 Package Boiler indicated the unit has exceeded the 40 CFR 60 Subpart Db opacity limit while firing fuel oil. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 6.1.7.b.v: This condition specified as an exceedance any 12-month period during which emissions of NO_X or SO_2 from the No. 4 Package Boiler exceed the PSD avoidance limit. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 6.1.7.b.vi: This condition specified as an exceedance any period of process operation during which the fuel oil burned in the No. 4 Package Boiler does not meet the sulfur content limit in Part 3.0 of the permit. This condition was related to PSD avoidance, 40 CFR 60 Subpart Db, and Georgia Rule (g). The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 6.1.7.b.vii: This condition specified as an exceedance any 12-month period during which emission of greenhouse gases from the No. 5 Package Boiler and No. 6 Package Boiler combined exceed 74,900 tons. The condition relates to PSD avoidance. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 requires the facility to calculate daily emissions of SAM, SO_2, NO_x, and CO emitted from the Power Boilers. The data is used to demonstrate compliance with PSD avoidance limits. The condition was part of Permit No. 2631-099-0001-V-03-0.

Condition 6.2.2 requires the facility to use the daily calculations from Condition 6.2.1 to calculate monthly and 12-month emission totals for emissions of SAM, NO_X, and CO from the Power Boilers. The calculations are used to demonstrate compliance with PSD avoidance limits. The facility must also provide reports for high monthly emissions and provide records of the emission totals with the quarterly reports. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.2.3 requires the facility to perform mercury analyses for the wastewater sludge burned in the Power Boilers. The facility must provide the results in the quarterly reports. The data is used to demonstrate compliance with 40 CFR 61 Subpart E. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.2.4 requires the facility to record the amount of TDF burned in each Power Boiler on an hourly and daily basis. The data is used to demonstrate compliance with PSD avoidance limits. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.2.5 requires the facility to record the daily amounts of wastewater sludge burned in the Power Boilers. The data is used to comply with the limit found in Part 3.4 of the permit. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.2.6 through 6.2.9 require the facility to collect the data necessary to verify the sulfur content of distillate oil, coal, wastewater sludge, and TDF burned at the facility in order to demonstrate compliance with Georgia Rule (g). The requirement appeared in Permit No. 2631-099-0001-V-03-0. As part of this renewal, the facility proposed to change conditions 6.2.7 through 6.2.9 to add supplier records as one of the compliance demonstration options along with revision of the sampling methods listed in the conditions. The Division will not make the requested changes as it believes that such changes will not provide adequate demonstration of compliance with applicable limits.

Condition 6.2.10 (formerly Condition 6.2.20) requires the facility to maintain monthly fuel usage records for the No. 5 Package Boiler and the NCG Incinerator. The condition is a requirement of 40 CFR 60 Subpart Dc. The requirement appeared in Permit No. 2631-099-0001-V-03-0. As part of this permit renewal, the facility proposed to add a Division approved approach for fuel usage recordkeeping requirements per 40 CFR 60, Subpart Dc. The Division will not grant this request as the condition specifies the requirements of the rule. This condition was modified as part of this renewal to remove the No. 6 Package Boiler

Condition 6.2.11 (formerly Condition 6.2.21) requires the facility to calculate greenhouse gas emissions from the No. 5 Package Boiler and No. 6 Package Boiler in order to demonstrate compliance with the PSD avoidance limit. The requirement appeared in Permit No. 2631-099-0001-V-03-0. This condition was modified as part of this renewal to remove the No. 6 Package Boiler

Conditions 6.2.12 through 6.2.14 (formerly Conditions 6.2.22 through 6.2.24) require the facility to calculate monthly and 12-month emission totals for total PM, PM_{10}, NO_x, CO, TRS, Pb, VOC, and SAM from the Lime Kilns. The records are used to demonstrate compliance with PSD avoidance conditions. The conditions require the facility to provide reports of the emission totals. The requirement appeared in Permit No. 2631-099-0001-V-03-0. As part of this renewal, the facility requested that Condition 6.2.12 be modified to list the actual application number referenced in the permit condition. The Division will make the requested permit changes.

Condition 6.2.15 (formerly Conditions 6.2.25) requires the facility to maintain production and lime mud records for the operation of the Lime Kilns. The records are required under 40 CFR 63 Subpart MM. The information is also used to collect data for demonstrating compliance with PSD avoidance limits. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Conditions 6.2.16 and 6.2.17 (formerly Conditions 6.2.26 and 6.2.27) require the facility to calculate 30-day rolling totals and 12-month totals for CaO production in the Lime Kiln in order to demonstrate compliance with PSD avoidance limits. The conditions also require the facility to provide reports. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.2.18 (formerly Condition 6.2.28) requires the facility to maintain monthly records of the amount of fuel oil burned in each Recovery Furnace. The records are used to demonstrate compliance with a PSD avoidance limit for the No. 3 Recovery Furnace. The data was also used to calculate the annual capacity factor for the No. 1 and No. 2 Recovery Furnaces as required by 40 CFR 60 Subpart Db. The requirements appeared in Permit No. 2631-099-0001-V-03-0. Per Permit No. 2631-099-0001-V-03-1, the No. 1 Recovery Furnace was modified to replace the No. 2 fuel fired burners with natural gas fired burners. As part of this renewal, the facility requests that the No. 1 Recovery Furnace be removed from this condition to reflect the changes made. The Division will make the requested changes.

Condition 6.2.19 (formerly Condition 6.2.29) requires the facility to maintain fuel receipts for the very low sulfur oil burned in the No. 1 and No. 2 Recovery Furnaces as required by 40 CFR 60 Subpart Db. The requirement appeared in Permit No. 2631-099-0001-V-03-0. Per Permit No. 2631-099-0001-V-03-1, the No. 1 Recovery Furnace was modified to replace the No. 2 fuel fired burners with natural gas fired burners. As part of this renewal, the facility requests that the No. 1 Recovery Furnace be removed from this condition to reflect the changes made. The Division will make the requested changes.

Condition 6.2.20 (formerly Condition 6.2.30) requires the facility to calculate the fuel oil annual capacity factors for the No. 1 and No. 2 Recovery Furnaces. The data is used to demonstrate compliance with the annual capacity factor avoidance limit for 40 CFR 60 Subpart Db. The requirement appeared in Permit No. 2631-099-0001-V-03-0. Per Permit No. 2631-099-0001-V-03-1, the No. 1 Recovery Furnace was modified to replace the No. 2 fuel fired burners with natural gas fired burners. As part of this renewal, the facility requests that the No. 1 Recovery Furnace be removed from this condition to reflect the changes made. The Division will make the requested changes.

Condition 6.2.21 (formerly Conditions 6.2.31) requires the facility to maintain BLS firing records for the operation of the Recovery Furnaces. The records are required under 40 CFR 63 Subpart MM. The requirements appeared in Permit No. 2631-099-0001-V-03-0. As part of this renewal the facility requested that the rule citation be corrected from 63.689(c)(1) to 40 CFR 63.866(c)(1). The Division will make the requested changes.

Condition 6.2.22 (formerly Condition 6.2.32) requires the facility to calculate 12-month fuel oil consumption totals for the No. 3 Recovery Furnace in order to demonstrate compliance with a PSD BACT limit. The condition also requires the facility to provide reports. The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.2.23 (formerly Condition 6.2.34) requires the facility to maintain records of used oil shipments and the analysis that was conducted for lead. The facility must also calculate 12-month totals for used oil usage in the Power Boilers, Lime Kilns, and the No. 3 Recovery Furnace. The facility must also provide fuel usage reports. These records are necessary to demonstrate compliance with the PSD avoidance limits for Pb.

Condition 6.2.24 (formerly Condition 6.2.35) requires the facility to maintain fuel receipts for residual oil burned at the site. The documents are used to demonstrate compliance with the fuel sulfur content limits under Georgia Rule (g). The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.2.25 through 6.2.31 (formerly Conditions 6.2.37 through 6.2.43) require the facility to maintain records and submit reports for the Lime Kilns, Recovery Furnaces, and Smelt Dissolving Tanks as required by 40 CFR 63 Subpart MM. The requirements appeared in Permit No. 2631-099-0001-V-03-0. This condition was modified as part of this renewal to remove reference to the SSM plan since 40 CFR 63 Subpart MM has been amended to remove exemptions for startup, shutdown and malfunction as applicable.

Conditions 6.2.32 through 6.2.42 (formerly Conditions 6.2.44 through 6.2.54) require the facility to maintain records and submit reports for the operation of the pulp mill as required by 40 CFR 63 Subpart S. The requirements appeared in Permit No. 2631-099-0001-V-03-0.

Conditions 6.2.43 through 6.2.45 (formerly Conditions 6.2.55 through 6.2.57) require the facility to maintain daily records of the amount of pulp processed on the No. 2 Paper Machine. The records then must be used to calculate 12-month VOC emissions totals from the unit and calculate the 30-day and 12-month pulp processing totals. The information is used to demonstrate compliance with PSD avoidance limits. The requirements appeared in Permit No. 2631-099-0001-V-03-0.
Condition 6.2.46 (formerly Condition 6.2.58) requires the facility to maintain records of dust suppression activities at the source. The data provides a reasonable assurance of compliance with Georgia Rule (n). The requirement appeared in Permit No. 2631-099-0001-V-03-0.

Condition 6.2.47 (formerly Condition 6.2.59) was added per Permit No. 2631-099-0001-V-03-1. This condition requires record keeping of No. 1 Recovery Furnace's monthly natural gas usage per existing regulatory requirements.

Condition 6.2.51 (formerly Condition 6.2.63) was added per Permit No. 2631-099-0001-V-03-1. This condition requires that the calculated annual emissions records be submitted to the Division for the five-year period of regular No. 1 Recovery Furnace operations following the proposed modification since it is not expected to increase the source's design capacity. The required submitted records must be submitted within 60 days of the end of each year during which records must be generated.

Condition 6.2.49 (formerly Condition 6.2.59) was added per Permit No. 2631-099-0001-V-03-3. This condition requires the facility to demonstrate compliance with the outlet concentration method of 40 CFR 63.443(d)(2). This condition specifies the numeric values that should be used as the HAP treatment efficiency for the steam stripper (X_{strip}) and the HAP destruction efficiency of the NCG/SOG Incinerator/Scrubber System (X_{inc}) when calculating the daily "Total Undestroyed Emissions" as required by existing Permit Condition 6.2.39 d.

Condition 6.2.50 was added as part of this renewal. This condition requires that e facility to submit electronic notifications and reports per 40 CFR 63 Subpart MM amendment requirements.

Conditions 6.2.51 and 6.2.52 were added as part of this renewal. These conditions require electronic reporting of outages per 40 CFR 63 Subpart MM amendment requirements.

Condition 6.2.53 was added as part of this renewal. This condition requires electronic reporting of excess emissions per 40 CFR 63 Subpart MM amendment requirements.

Condition 6.2.54 was added as part of this renewal. This condition specifies records of boiler tune ups per 40 CFR 63, Subpart DDDDD.

Condition 6.2.55 was added as part of this renewal. This condition specifies periodic compliance reports per 40 CFR 63, Subpart DDDDD.

Condition 6.2.56 was added as part of this renewal. This condition specifies notifications for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.57 was added as part of this renewal. This condition specifies deviation reporting for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.58 was added as part of this renewal. This condition specifies reporting for short term operating limits for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.59 was added as part of this renewal. This condition specifies fuel usage records for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.60 was added as part of this renewal. This condition specifies performance testing reporting for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.61 was added as part of this renewal. This condition specifies electronic reporting of performance testing to EPA for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.62 was added as part of this renewal. This condition specifies electronic file reporting of applicable reports the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.63 was added as part of this renewal. This condition specifies the requirements of the compliance reports for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.64 was added as part of this renewal. This condition specifies the recordkeeping schedule requirements for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.65 was added as part of this renewal. This condition specifies the requirements of reports/notification copies maintenance for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.66 was added as part of this renewal. This condition specifies the reports requirements for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.67 was added as part of this renewal. This condition specifies records for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.68 was added as part of this renewal. This condition specifies records for the continuous monitoring systems for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Condition 6.2.69 was added as part of this renewal. This condition specifies site specific plans for the No. 1 and No. 2 Boilers per 40 CFR 63, Subpart DDDDD.

Conditions Not Included in the Renewal Permit

Permit No. 2631-099-0001-V-03-0, Conditions 6.2.10 through 6.2.12: These conditions required the facility to calculate monthly and 12-month emission totals for NO_X and SO_2 emitted from the No. 4 Package Boiler. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Conditions 6.2.13 through 6.2.18: These conditions contained record keeping and reporting requirements for the No. 4 Package Boiler as required by 40 CFR 60 Subpart Db. The conditions included steam generating day records, NO_X CEMS and COMS records, and fuel usage records. The No. 4 Package Boiler has been removed from service so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 6.2.19: This condition required the facility to submit notifications for the construction and startup of the No. 5 Package Boiler and No. 6 Package Boiler. The conditions are a requirement of 40 CFR 60 Subpart Dc. The event has passed, so this condition is no longer necessary.

Permit No. 2631-099-0001-V-03-0, Condition 6.2.33: This condition required used oil records received via shipment. As part of this renewal, the facility requested that Condition 6.2.33 is deleted as no used oil is received via shipment. The Division will make the requested changes.

Permit No. 2631-099-0001-V-03-0, Condition 6.2.36: This condition required the facility to implement and follow SSM Plan for 40 CFR 63 Subpart MM. This condition has been removed since 40 CFR 63 Subpart MM was amended to as exemptions for startup, shutdown, and malfunction.

Permit No. 2631-099-0001-V-03-1, Condition 6 6.2.61: This condition required the facility to maintain records per Georgia Air Rule 391-3-1-.02(7) and 40 CFR 51.165. It required the facility submit a description of the proposed project, identification of the emission unit whose emission of PSD/ New Source Review (NSR) pollutant(s) could be affected by the proposed project, and a description of the applicability test used to determine is not a major modification for any regulated PSD/NSR pollutant before the proposed modification for a period ten years following the resumption of regular operations after the auxiliary burners replacement since it is not expected to increase the source's design capacity. This condition was removed because the compliance period has passed.

Permit No. 2631-099-0001-V-03-1, Condition 6.2.62: This condition allowed the exclusion of demand growth. This condition was removed because the compliance period has passed.

Permit No. 2631-099-0001-V-03-1, Condition 6.2.63: This condition required that the calculated annual emissions records be submitted to the Division for the five-year period of regular No. 1 Recovery Furnace operations following the proposed modification since it is not expected to increase the source's design capacity. The required submitted records must be submitted within 60 days of the end of each year during which records must be generated. This condition was removed because the compliance period has passed.

Permit No. 2631-099-0001-V-03-1, Condition 6.2.64: This condition required notifications for applicable equipment. This condition was removed because the compliance period has passed.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable. No operational flexibility associated with this application.

B. Alternative Requirements

Not Applicable. No alternative requirements incorporated into this Title V permit.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

Not Applicable. No temporary sources associated with this application.

E. Short-Term Activities

The Permittee is required to keep a log indicating the date and duration of ash pond dredging and associated spreading.

F. Compliance Schedule/Progress Reports

Not Applicable. No compliance schedule/progress reports are added as part of this application.

G. Emissions Trading

Not Applicable. No emissions trading associated with this application.

H. Acid Rain Requirements

The facility is not subject to acid rain requirements.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F is included in Permit No, 2631-099-0001-V-04-0. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source.

J. Pollution Prevention

Not Applicable. There are no pollution prevention provisions incorporated into this Title V permit.

K. Specific Conditions

Not Applicable. There are no pollution specific conditions incorporated into this Title V permit.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//